

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Petition of SunCom Wireless, Inc. For Designation as an	)	
Eligible Telecommunications Carrier in Georgia, North	)	
Carolina, Tennessee, and Virginia	)	
	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	

**PETITION OF SUNCOM WIRELESS, INC. FOR DESIGNATION  
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN GEORGIA, NORTH CAROLINA, TENNESSEE, AND  
VIRGINIA**

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SunCom Wireless, Inc. f/k/a Triton PCS, Inc. ( “SunCom”), pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”), hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) throughout the proposed Designated ETC Service Area described herein, including areas served by both non-rural and rural incumbent local exchange carriers (“ILECs”), in the states of Georgia, North Carolina, Tennessee, and Virginia. As demonstrated below, SunCom meets all of the requirements for designation as an ETC and SunCom’s designation will serve the public interest.

**I. INTRODUCTION AND SUMMARY**

SunCom is authorized to provide commercial mobile radio service (“CMRS”) over broadband personal communications service (“PCS”) and cellular licenses in Georgia, South Carolina, North Carolina, Tennessee, and Virginia, as well as in Puerto Rico and the U.S.

Virgin Islands. <sup>1/</sup> SunCom intends to obtain high-cost universal service support funding throughout its licensed service area in the continental U.S., including areas served by both rural and non-rural ILECs, to speed the delivery of advanced wireless services to consumers in this area. SunCom is a common carrier, consistent with the definition in 47 U.S.C. §§ 153(10) and 332(c)(1), and the requirements of 47 U.S.C. § 214(e)(1). SunCom already is an ETC in Puerto Rico, pursuant to designation by the Junta Reglamentadora de Telecomunicaciones de Puerto Rico (Telecommunications Regulatory Board).

SunCom currently provides all the services and functionalities supported by the federal universal service program set forth in Section 54.101(a) of the Commission's Rules throughout the areas for which it seeks ETC designation in Georgia, North Carolina, Tennessee, and Virginia. SunCom provides universal service to its PCS consumers over its existing wireless network infrastructure using existing and soon-to-be-constructed antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by SunCom to serve its existing PCS customers. Upon designation as an ETC, SunCom will accelerate its program of network construction and improvement, and will commit to making its universal service available within a reasonable time frame to all requesting customers in the area for which it proposes to be

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<sup>1/</sup> A list of SunCom's licensed PCS service areas, by Basic Trading Area ("BTA"), is included in Exhibit A to this application. We note that SunCom has agreed to acquire Urban Comm-North Carolina, Inc., which will result in the assignment to SunCom of several additional BTA licenses in North Carolina and Virginia. See Public Notice, *Urban Comm-North Carolina, Inc., SunCom Wireless, Inc., and Cellco Partnership Seek FCC Consent to the Transfer of Control and Assignment of Broadband PCS Licenses*, WT Docket No. 05-169, DA 05-1042, 20 FCC Rcd 7652 (Wireless Telecom. Bur., released April 8, 2005). Once that assignment consummates, SunCom may seek to supplement this petition by adding additional geographic areas.

designated. <sup>2/</sup> As discussed below, designating SunCom as an ETC will advance the public interest.

## **II. SUNCOM SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

SunCom satisfies each of the elements required for ETC designation pursuant to Section 214(e)(6) of the Act. <sup>3/</sup>

### **A. The State Commissions Have Determined That They Lack Authority to Designate CMRS Carriers As ETCs.**

In the *Section 214(e)(6) Public Notice*, the Commission established that a carrier must demonstrate it is “not subject to the jurisdiction of a state commission” in order to petition the Commission for designation as an ETC. In its *Twelfth Report and Order*, the Commission stated that where a carrier provides the Commission with an “affirmative statement” from the state commission or a court of competent jurisdiction that the state commission lacks jurisdiction to perform the designation, the Commission will consider requests filed pursuant to 214(e)(6).” <sup>4/</sup> In the *Highland Cellular Order*, the Commission affirmed that, where a state commission was “given the specific opportunity to address and resolve the issue of whether it has authority to regulate CMRS providers as a class of carriers” and determined generically that it has no such jurisdiction, subsequent wireless carriers need not seek individualized rulings from

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<sup>2/</sup> See *infra* Section III. See also *Federal-State Joint Board on Universal Service; Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, 15 FCC Rcd 15168 (2000).

<sup>3/</sup> Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act, Public Notice, 12 FCC Rcd 22947 (1997) (“*Section 214(e)(6) Public Notice*”), citing 47 U.S.C. § 214(e)(6).

<sup>4/</sup> *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, 15 FCC Rcd 12208, 12265, ¶ 114 (2000) (“*Twelfth Report and Order*”).

that state commission. <sup>5/</sup> In response to opportunities to address and resolve the question of whether they have jurisdiction over ETC applications by CMRS providers, the state commissions for each of the states subject to this application have issued generic rulings that they do not have jurisdiction to designate this class of carriers:

- Georgia. In a letter issued on July 2, 2003, the Georgia Public Service Commission stated that it “does not exercise jurisdiction over Commercial Mobile Radio Service providers for purposes of making determinations concerning eligibility for Eligible Telecommunications Carrier designation under 47 U.S.C. Section 214(e) and 47 C.F.R. Section 54.201 *et seq.*” <sup>6/</sup>
- North Carolina. In two orders, issued respectively on June 24, 2003 and August 28, 2003, the North Carolina Utilities Commission stated that it “lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC.” <sup>7/</sup>
- Tennessee. In an order issued on April 11, 2003, the Tennessee Regulatory Authority dismissed an application for ETC designation on the ground that the agency lacks jurisdiction over CMRS providers. <sup>8/</sup>
- Virginia. On April 9, 2002, in the Application of Virginia Cellular, LLC, Case Number PUC010263, the Virginia State Corporation Commission found that “this Commission has not asserted jurisdiction over CMRS carriers and that the Applicant should apply to the FCC for ETC designation.” <sup>9/</sup>

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<sup>5/</sup> *Federal-State Joint Board on Universal Service, Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, 19 FCC Rcd 6422, ¶¶ 13-14 (2004) (“*Highland Cellular Order*”).

<sup>6/</sup> Letter from Robert B. Baker, Jr., Chairman, Georgia Public Service Commission, in response to letter filed by counsel for NPCR, Inc., d/b/a Nextel Partners (July 2, 2003) (attached hereto as Exhibit B-1). *See also Federal-State Joint Board on Universal Service; Sprint Corp. Application for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Florida, Georgia, New York, North Carolina, Tennessee, and Virginia*, 19 FCC Rcd 22663, ¶ 9 (Wireless Telecom. Bur. 2004) (“*Sprint ETC Order*”).

<sup>7/</sup> *Designation of Carriers Eligible for Universal Carrier Support*, Docket No. P-100, Sub 133c, Order Granting Petition, at 2 (N.C. Util. Comm’n June 24, 2003); *Designation of Carriers Eligible for Universal Carrier Support*, Docket No. P-100, Sub 133c, Order Granting Petition, at 2 (N.C. Util. Comm’n Aug. 28, 2003) (attached hereto as Exhibit B-2). *See also Sprint ETC Order*, ¶ 9.

<sup>8/</sup> *Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier*, Order, Docket No. 02-01245, at 2-3 (Tenn. Regulatory Auth., April 11, 2003) (attached hereto as Exhibit B-3). *See also Sprint ETC Order*, ¶ 9.

<sup>9/</sup> *Application of Virginia Cellular Order, LLC for Designation As An Eligible Telecommunication Provider under 47 U.S.C. § 214(e)(2)*, Case No. PUC010263 at 4-5 (Virginia State Corporation Commission, April 9, 2002) (attached hereto as Exhibit B-4). *See also Federal-State Joint Board on Universal Service; Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, 19 FCC Rcd 1563, ¶ 13 (2004) (“*Virginia Cellular Order*”); *Highland Cellular Order*, ¶¶ 13-14; *Sprint ETC Order*, ¶ 9..

The regulatory decisions cited above provide the requisite “affirmative statement” from each of the respective state commissions, as required under Section 214(e)(6), that the FCC is the appropriate regulatory authority to consider SunCom’s petition for ETC status in Georgia, North Carolina, Tennessee, and Virginia.

**B. SunCom Offers Each of the Services Supported by the Federal High-Cost Universal Service Program.**

SunCom provides all the services and functionalities supported by the federal universal service program, as set forth in Section 241(e) of the Act and Section 54.101(a) of the Commission’s Rules, throughout the service area for which it seeks ETC designation in Georgia, North Carolina, Tennessee, and Virginia.

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area. 47 U.S.C. § 214(e)(1). The Commission has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:

1. Voice-grade access to the public switched telephone network;
2. Local usage;
3. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income consumers.



For purposes of ETC applications, carriers must demonstrate that they provide each of the supported services, or where appropriate, its functional equivalent.<sup>10/</sup> As shown below, SunCom currently provides, or will provide upon designation, each of the required services and functionalities throughout the area for which it seeks designation.

## **1. Voice-Grade Access to the Public Switched Network.**

The Commission has concluded that voice-grade access means the ability to make and receive phone calls within a specified bandwidth and frequency range.<sup>11/</sup> SunCom meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local exchange carriers, each of SunCom's customers are able to make and receive calls on the public switched telephone network within the specified bandwidth.

## **2. Local Usage.**

ETCs must include local usage beyond providing simple access to the public switched network as part of a universal service offering. In the *First Report and Order*, the Commission deferred a determination on the amount of local usage that a carrier would be required to provide.<sup>12/</sup> The Commission recently declined to adopt a specific local usage threshold.<sup>13/</sup> SunCom includes local and long-distance usage in each of the rate plans that it offers consumers – including SunCom's "Un-Plan<sup>SM</sup>" which includes unlimited local and

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<sup>10/</sup> Section 214(e)(6) Public Notice, 12 FCC Rcd at 22948 & n.5.

<sup>11/</sup> Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776 at 8810-11 (1997) ("*First Report and Order*").

<sup>12/</sup> *Id.* at 8812-14.

<sup>13/</sup> Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, FCC 05-46, ¶ 32 (released Mar. 17, 2005) ("*ETC Designation Framework Order*"). In Section IV.B(5). below, we address how SunCom intends to comply with the *ETC Designation Framework Order*'s new requirement regarding local usage plans that are "comparable" to those offered by ILECs. *Id.*, ¶¶ 33-34; 47 C.F.R. § 54.202(a)(4).

domestic long-distance calling at a flat rate – and thereby complies with the requirement that all ETCs offer local usage.

**3. Dual-Tone Multi-Frequency (“DTMF”) Signaling, or Its Functional Equivalent.**

DTMF is a method of signaling that facilitates the transportation of call-set up and call detail information. Consistent with the principles of competitive and technological neutrality, the Commission permits carriers to provide signaling that is functionally equivalent to DTMF, such as out-of-band digital signaling, in satisfaction of this requirement.<sup>14/</sup> SunCom currently uses out-of-band digital signaling that is functionally equivalent to DTMF and SunCom therefore meets this requirement.

**4. Single-Party Service or Its Functional Equivalent.**

“Single-party service” means that only one party will be served by a subscriber loop or access line (in contrast to a multi-party line).<sup>15/</sup> The Commission has concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission.”<sup>16/</sup> SunCom meets the requirement of single-party service in this manner.

**5. Access to Emergency Services.**

The ability to reach a public emergency service provider by dialing 911 is required in any universal service offering. SunCom currently provides its subscribers with access to 911 emergency services in accord with this requirement, and consistent with

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<sup>14/</sup> 47 C.F.R. § 54.101(a)(3).

<sup>15/</sup> *First Report and Order*, 12 FCC Rcd at 8810.

<sup>16/</sup> *Id.*

Commission regulations throughout the service area for which designation is sought. SunCom also provides Enhanced 911 Services in compliance with the FCC's applicable rules.<sup>17/</sup>

**6. Access to Operator Services.**

Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.<sup>18/</sup> SunCom meets these requirements by providing all of its customers with access to operator services, including customer service and call completion, provided by either SunCom or other entities.

**7. Access to Interexchange Service.**

An ETC must offer consumers access to interexchange service to make and receive toll or interexchange calls. SunCom meets this requirement by providing all of its customers with the ability to make and receive interexchange calls. SunCom's rate plans include nationwide interexchange calling at the same rate as local calls.

**8. Access to Directory Assistance.**

The ability to place a call to directory assistance is a required service offering.<sup>19/</sup> SunCom meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "555-1212".

**9. Toll Limitation for Qualifying Low-Income Consumers.**

An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no additional charge. 47 C.F.R. § 54.101(a)(9). SunCom currently has no Lifeline customers in the areas for which it proposes to be designated as an ETC in this application, because only designated ETCs can participate in the provision of Lifeline service.

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<sup>17/</sup> Cf. *Virginia Cellular Order*, ¶ 19.

<sup>18/</sup> *First Report and Order*, 12 FCC Rcd at 8817-18.

<sup>19/</sup> *First Report and Order*, 12 FCC Rcd at 8821.

Once designated as an ETC, SunCom will participate in Lifeline as required, and will provide toll control and/or toll blocking capability in satisfaction of the Commission's requirement. SunCom currently has the technology to provide toll limitation and will utilize this technology to provide such functionality at no additional charge to Lifeline customers. <sup>20/</sup>

**C. SunCom Will Offer Supported Services Over a Combination of Its Own Facilities and Resale of Other Carrier's Services.**

A carrier requesting designation must demonstrate that it offers the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services."<sup>21/</sup> SunCom will provide the supported services using its existing network infrastructure, which includes the antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by SunCom to serve its existing PCS customers. In addition, in certain areas, SunCom will provide the supported services using resale of services offered by other wireless carriers.

**D. SunCom Will Advertise Its Universal Service Offering.**

SunCom will advertise the availability of the supported services and the corresponding charges in a manner that informs the general public within the designated service area of both the services available and the corresponding charges. SunCom advertises its wireless services through several different media of general distribution throughout the service areas for which designation is requested and will use the same media to advertise its universal service offerings throughout the service areas designated by the Commission. In addition, once SunCom receives ETC designation, it will provide notices of its service offerings, including the availability of Lifeline and Link Up discounts, using outreach methods intended to reach

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<sup>20/</sup> See *Virginia Cellular Order*, ¶ 22.

<sup>21/</sup> 47 U.S.C. § 214(e)(1)(A).

households that do not currently have telecommunications service, including any sizeable non-English-speaking populations in the ETC designated areas, and in coordination with government agencies that administer the relevant assistance programs. [22/](#)

### **III. SUNCOM REQUESTS DESIGNATION THROUGHOUT ITS PROPOSED “DESIGNATED ETC SERVICE AREA” IN GEORGIA, NORTH CAROLINA, TENNESSEE, AND VIRGINIA**

SunCom requests ETC designation for its entire licensed service area in Georgia, North Carolina, Tennessee, and Virginia, as well as certain limited adjacent areas, as depicted on the maps attached hereto in Exhibit C. The area for which SunCom proposes to be designated as an ETC, referred to as the “Designated ETC Service Area,” includes each of the non-rural ILEC wire centers listed in Exhibit D-1, and the entirety of each of the rural ILEC study areas listed in Exhibit D-2.

SunCom will provide service to the vast majority of the proposed Designated ETC Service Area using its own wireless network facilities. With respect to the minor portions of the Designated ETC Service Area falling within portions of SunCom’s service area where SunCom lacks adequate network coverage, or areas outside SunCom’s licensed service area, SunCom will serve customers via the resale of services offered by other wireless carriers.[23/](#) SunCom already has arrangements in place that enable its customers located outside the area to which it provides facilities-based wireless service, but within its Designated ETC Service Area,

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[22/](#) *Lifeline and Link-Up*, 19 FCC Rcd 8302, ¶ 45 (2004).

[23/](#) An ETC may provide the supported services “using either its own facilities or a combination of its own facilities and resale of another carrier’s services.” 47 U.S.C. § 214(e)(1)(A)(i). *See also Virginia Cellular Order*, ¶ 37 (specifically noting permissibility of providing service using combination of facilities-based and resale of wireline or wireless services); *id.*, ¶ 24. SunCom will not file line counts including customers whose billing addresses it serves exclusively via resale, and will not claim support with respect to such customers. 47 C.F.R. § 54.307(a)(3).

to receive service via “roaming” over the networks of other wireless carriers – in essence, a form of resale.

#### **IV. GRANTING THIS PETITION WILL SERVE THE PUBLIC INTEREST.**

##### **A. SunCom Satisfies the Commission’s Public Interest Standard.**

SunCom is seeking ETC designation in areas served by rural LECs. The Commission must therefore determine that SunCom’s designation as an ETC in each case is in the public interest. <sup>24/</sup> The Commission has articulated the public interest standard for designating ETCs in rural ILEC areas as follows:

In determining whether designation of a competitive ETC in a rural telephone company’s service area is in the public interest, we weigh the benefits of increased competitive choice, the impact of the designation on the universal service fund, the unique advantages and disadvantages of the competitor’s service offering, any commitments made regarding quality of telephone service, and the competitive ETC’s ability to satisfy its obligation to serve the designated service areas within a reasonable time frame. <sup>25/</sup>

As demonstrated below, the Commission should find, pursuant to this standard, that designating SunCom as an ETC would serve the public interest in rural ILEC areas. Moreover, given that SunCom satisfies the more rigorous public interest standard that applies to areas served by rural ILECs, and given that SunCom satisfies the statutory eligibility criteria set forth in Section 214(e)(1) of the Act, it follows that it would be “consistent with the public interest, convenience, and necessity” to designate SunCom in non-rural ILEC areas. <sup>26/</sup>

We note that the Commission recently adopted modifications to its public interest standard in the *ETC Designation Framework Order*. SunCom is not required to meet the

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<sup>24/</sup> 47 U.S.C. §214(e)(6).

<sup>25/</sup> *Virginia Cellular Order* at ¶ 28.

<sup>26/</sup> 47 U.S.C. §§ 214(e)(1), (6); *Virginia Cellular Order*, ¶ 27; *Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, 16 FCC Rcd 39, 45, ¶ 14 (Com. Car. Bur. 2000).

requirements for ETC designation specified in the *ETC Designation Framework Order* because this application was pending before the *ETC Designation Framework Order* took effect. <sup>27/</sup> Nonetheless, we show in the following section that SunCom will be prepared to demonstrate that it complies with the *ETC Designation Framework Order* requirements when it submits its annual certification.

### **1. Benefits of Increased Competitive Choice.**

The Commission has recognized that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural high-cost areas by increasing customer choice, innovative services, and new technologies.” <sup>28/</sup> SunCom will implement a variety of service offerings and rate plans that will be both competitive with the incumbent LEC service offerings and affordable to consumers in Georgia, North Carolina, Tennessee, Virginia, and the U.S. Virgin Islands. As discussed above, SunCom’s local service area – effectively, the entire country – will be larger than the incumbent LECs’ local service areas, affording consumers the opportunity to reduce intra-LATA toll charges. Moreover, SunCom’s “Un-Plan” is unusual among wireless carriers and delivers consumers a simple, straightforward, and easily understood package that is lacking in other wireless carriers’ overly complicated sets of plans.

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<sup>27/</sup> *Federal-State Joint Board on Universal Service; Virginia PCS Alliance, L.C. and Richmond 20 MHz LLC d/b/a NTELOS*, DA 05-1663, ¶ 8 (rel. June 14, 2005). The *ETC Designation Framework Order* is scheduled to take effect on June 24, 2005 – 30 days after the date it was published in the Federal Register. See 70 Fed. Reg. 29960 (May 25, 2005). However, the information collection requirements in that *Order*, including the expanded requirements regarding the content of ETC applications in 47 C.F.R. § 54.202, will not take effect until they have been approved by the Office of Management and Budget pursuant to the Paperwork Reduction Act. See *ETC Designation Framework Order*, ¶ 109; see also *Notice of Public Information Collections Being Reviewed by the Federal Communications Commission*, 70 Fed. Reg. 24787 (May 11, 2005) (seeking comments on or before July 11, 2005, regarding the *ETC Designation Framework Order*’s collection of information subject to the Paperwork Reduction Act, and reiterating that “An agency may not conduct or sponsor a collection of information unless it displays a currently valid control number. No person shall be subject to any penalty for failing to comply with a collection of information subject to the Paperwork Reduction Act that does not display a valid control number.”).

<sup>28/</sup> *Federal-State Joint Board on Universal Service; Western Wireless Corp. Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, 16 FCC Rcd 48, 55 (Com. Car. Bur. 2000), *aff’d*, 16 FCC Rcd 19144, ¶ 17 (2001).

Designating SunCom as an ETC will bring consumers the benefits of competition, including increased choices, higher quality service, and lower rates. In a competitive market, rural consumers will be able to choose the services that best meet their communications needs. With a choice of service providers, the consumer is able to select a provider based on service quality, service availability and rates. Receiving universal service funding will enable SunCom to significantly improve the quality and coverage of its network facilities, to the benefit of wireless consumers throughout the area, and will strengthen both intra-modal wireless competition and inter-modal wireless/wireline competition.

In addition, designating SunCom as an ETC will also provide a heightened incentive to the incumbent LECs to improve their existing networks in order to remain competitive, resulting in improved services to consumers. The Commission has noted that “we believe that competition may provide incentives to the incumbent to implement new operating efficiencies, lower prices, and offer better service to its customers.”<sup>29/</sup> For example, ILECs will face incentives to broaden their local calling areas and/or reduce their toll charges, to the benefit of consumers, because SunCom’s local calling area is larger than those of the incumbent local exchange carriers it competes against, SunCom’s customers will be subject to fewer toll charges.<sup>30/</sup>

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<sup>29/</sup> *Federal-State Joint Board on Universal Service; Guam Cellular and Paging, Inc., d/b/a/ GuamCell Communications Petition for Designation as an Eligible Telecommunications Carrier in the Territory of Guam*, 17 FCC Rcd 1502, ¶ 22 (Com. Car. Bur. 2002).

<sup>30/</sup> *Virginia Cellular Order*, ¶ 29.



## **2. Impact of the Designation on the Fund.**

Designating SunCom as an ETC will have only a negligible impact on the overall universal service high-cost fund. As the Commission has recognized, it is most productive to consider issues of fund growth in the broader context of generic rulemaking proceedings.<sup>31/</sup>

## **3. Unique Advantages of SunCom's Service Offering.**

Importantly, designating SunCom as an ETC will bring consumers in Georgia, North Carolina, Tennessee, and Virginia the unique benefits of mobile telephony. The Commission has recognized the benefits that wireless carriers can bring to the universal service program. For example, the Commission found that the mobility of wireless ETCs' service "assists consumers in rural areas who often must drive significant distances to places of employment, stores, schools, and other critical community locations. In addition, the availability of a wireless universal service offering provides access to emergency services that can mitigate the unique risks of geographic isolation associated with living in rural communities."<sup>32/</sup> Consistently, the Commission has found that "imposing additional burdens on wireless entrants would be particularly harmful to competition in rural areas, where wireless carriers could potentially offer service at much lower costs than traditional wireline service."<sup>33/</sup>

Thus, designation of SunCom as an ETC will provide consumers with a valuable alternative to the existing telecommunications services offered in these rural areas, including the larger local calling area, the benefits of mobile telephone service and, where requested by the

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<sup>31/</sup> *Virginia Cellular Order*, ¶ 31; *Highland Cellular Order*, ¶ 25; *ETC Designation Framework Order*, ¶ 54 ("As the Commission has found in the past, analyzing the impact of one ETC on the overall fund may be inconclusive. Indeed, given the size of the total high-cost fund — approximately \$3.8 billion a year — it is unlikely that any individual ETC designation would have a substantial impact on the overall size of the fund. In addition, the Commission is considering in other proceedings, such as the *Rural Referral Proceeding*, how support is calculated for both rural incumbent LECs and [competitive] ETCs.") (footnotes omitted).

<sup>32/</sup> *Virginia Cellular Order* at ¶ 29.

<sup>33/</sup> *First Report and Order*, 12 FCC Rcd 8776, 8882-8883.

PSAP, location assistance for customers calling 911. In addition, as discussed above, SunCom's unique wireless calling plans provide mobile consumers a simple, straightforward, and easily understood package that should be appealing to consumers and strengthen both intra-modal wireless competition and inter-modal wireless/wireline competition.

#### **4. Commitments on Quality of Telecommunications Service.**

SunCom is dedicated to building strong customer relationships by providing customers with services that exceed expectations. SunCom offers a superior customer service experience. To further demonstrate the quality of its customer service, SunCom will provide a confidential report to the Commission on the number of consumer complaints per 1,000 handsets each year.<sup>34/</sup> SunCom is a signatory to and already complies with the Cellular Telecommunications & Industry Association ("CTIA") Consumer Code for Wireless Service.

SunCom also plans to maintain and construct additional cell sites in rural areas using the universal service funds it expects to receive if it receives designation as an ETC, which it would not be able to maintain or construct in the absence of universal service funding. These network improvements should improve the coverage, signal strength, and service quality that consumers in rural areas in Georgia, North Carolina, Virginia, and Tennessee will enjoy as a result of SunCom's ETC designation. Attached as Exhibit E is a five-year plan providing a specific demonstration of how high-cost support will be used for service improvements that would not occur absent receipt of such support. The data included in this plan are highly confidential commercial and financial trade secret information concerning competitive wireless services, and public disclosure of these data could cause serious competitive harm to SunCom by giving competitors access to the details of our network deployment and capital expenditure

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<sup>34/</sup> *Id.*

plans. Accordingly, pursuant to 5 U.S.C. § 552(b)(4) and Section 0.459 of the Commission's rules, SunCom respectfully requests that the unredacted version of Exhibit E be withheld from public inspection.<sup>35/</sup>

**5. Ability to Serve Customers Within a Reasonable Time Frame.**

SunCom will comply with the same customer service deployment commitments as those offered by Virginia Cellular. SunCom will provide service immediately using its standard customer equipment to potential customers requesting service. In instances where a request comes from a potential customer within SunCom's licensed service area but outside its existing network coverage, it will take a number of steps to provide service that include determining whether: (1) the requesting customer's equipment can be modified or replaced to provide service; (2) a roof-mounted antenna or other equipment can be deployed to provide service; (3) adjustments can be made to the nearest cell tower to provide service; (4) there are any other adjustments that can be made to network or customer facilities to provide service; (5) it can offer resold services from another carrier's facilities to provide service; and (6) an additional cell site, cell extender, or repeater can be employed or can be constructed to provide service. In addition, if after following these steps, SunCom still cannot provide service, it will notify the requesting party and report the unfulfilled request to the Commission within 30 days after making such determination.<sup>36/</sup> Furthermore, in connection with its annual reporting obligations, SunCom will submit in an annual report filed with the Commission information detailing how

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<sup>35/</sup> Once the *ETC Designation Framework Order* takes effect, SunCom will submit the five-year plan and progress reports that the *Order* requires. *ETC Designation Framework Order*, ¶¶ 23, 69; 47 C.F.R. §§ 54.202(a)(1)(B), 54.209(a)(1).

<sup>36/</sup> *Id.*

many requests for service were unfulfilled for the past year and how SunCom attempted to provide service to those potential customers.<sup>37/</sup>

## **6. Creamskimming.**

SunCom proposes to operate as an ETC throughout each of the rural telephone company study areas. Therefore, no study area redefinition need be considered, and there is no need to conduct a “creamskimming” analysis. <sup>38/</sup>

### **B. SunCom Is Prepared to Demonstrate That It Satisfies the Recently-Adopted Additional Requirements for Commission Designation of ETCs Pursuant to Section 214(e)(6).**

The Commission recently adopted additional eligibility requirements for carriers seeking ETC designation.<sup>39/</sup> An ETC applicant subject to these new requirements must (1) commit to provide service throughout its designated service area to all requesting customers, and to provide a five-year plan demonstrating how high-cost universal service support will be used to improve its coverage, service quality or capacity throughout the service area for which it seeks designation; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate that it will satisfy applicable consumer protection and service quality standards; (4) offer local usage plans comparable to those offered by the ILEC in the service area for which it seeks designation; and (5) acknowledge that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations.<sup>40/</sup> While as noted above, SunCom is not subject to these new requirements because this application was pending

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<sup>37/</sup> ETC Designation Framework Order, ¶ 69.

<sup>38/</sup> Cf. *Virginia Cellular Order*, ¶¶ 32-35. See also *ETC Designation Framework Order*, ¶¶ 48-53.

<sup>39/</sup> ETC Designation Framework Order.

<sup>40/</sup> 47 C.F.R. § 54.202(a)(1)-(5).

before the *ETC Designation Framework Order* took effect,<sup>[41/](#)</sup> SunCom is prepared to make the required showings when it submits its annual certification, as further described below.

**1. SunCom Commits to Provide Service Throughout Its Designated Area to All Customers Making a Reasonable Request.**

SunCom will comply with the customer service deployment commitments set forth in the *ETC Designation Framework Order*.<sup>[42/](#)</sup> If, after following the steps specified therein, SunCom still cannot provide service, it will notify the requesting party and report the unfulfilled request to the Commission within 30 days after making such determination.<sup>[43/](#)</sup> Furthermore, in connection with its annual reporting obligations, SunCom will submit in an annual report filed with the Commission information detailing how many requests for service were unfulfilled for the past year and how SunCom attempted to provide service to those potential customers.<sup>[44/](#)</sup>

**2. SunCom Plans to Use High-Cost Support to Improve Signal Quality, Coverage, and Capacity Over the Next Five Years.**

SunCom will use universal service funds to improve service within the Designated ETC Service Area. SunCom will, as required by Section 214(e) of the Act, use all federal high cost support that it receives for the construction, maintenance and upgrading of facilities used to provide supported service in rural and high-cost areas. As a broadband PCS licensee in the proposed ETC designated service areas, SunCom is in compliance with its construction obligations under Section 24.203 of the FCC's rules. Receipt of universal service high-cost funds will enable SunCom to accelerate and complete its deployment of wireless

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<sup>[41/](#)</sup> See *supra* note 27.

<sup>[42/](#)</sup> *ETC Designation Framework Order*, ¶ 22.

<sup>[43/](#)</sup> *Id.*

<sup>[44/](#)</sup> *ETC Designation Framework Order*, ¶ 69.

network facilities throughout its Designated ETC Service Area, as demonstrated in Exhibit E. Exhibit E is a five-year plan providing a specific demonstration of how high-cost support will be used for service improvements that would not occur absent receipt of such report.

### **3. SunCom Can Remain Functional In Emergency Situations.**

SunCom has the ability to remain functional in emergency situations. SunCom has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.<sup>45/</sup> SunCom has the ability to deploy portable facilities known as “COWs” (Cellular on Wheels) as temporary cell site facilities where permanent facilities are unable to provide service due to an emergency event.<sup>46/</sup> As required by the Commission’s rules, SunCom will certify on an annual basis that it is able to function in emergency situations.<sup>47/</sup> Furthermore, in connection with its annual reporting obligations, SunCom will submit data concerning outages in its designated service areas that affect at least ten percent of the end users served in that area or that potentially affect a 911 special facility. Such data shall include (1) the date and time of onset of the outage; (2) a brief description of the outage and its resolution; (3) the particular services affected; (4) the geographic areas affected by

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<sup>45/</sup> ETC Designation Framework Order, ¶ 25.

<sup>46/</sup> In particular, SunCom has fixed and portable backup power generators deployed in various locations throughout our network ready to be deployed in the event of an emergency situation. These backup power generators can maintain our cell sites on air for a few days, which in most cases is long enough for us to restore power to our sites or to provide additional fuel for the generators to keep them turned on. SunCom also has the ability to change call routing translations to divert calls from routes that could be damaged or out of service and route the calls through other portions of our network. SunCom is able to manage traffic spikes through call rerouting changes, capacity additions, and deployment of COWs.

<sup>47/</sup> ETC Designation Framework Order, ¶ 26 and ¶ 69.

the outage; (5) steps taken to prevent a similar situation in the future; and (6) the number of customers affected.<sup>48/</sup>

**4. SunCom Satisfies Applicable Consumer Protection and Service Quality Standards.**

As further described above, SunCom is dedicated to building strong customer relationships by providing customers with services that exceed expectations. SunCom will continue to abide by that CTIA Consumer Code and, as required by the *ETC Designation Framework Order*, SunCom will certify to the Commission on an annual basis its compliance with that code.<sup>49/</sup>

**5. SunCom Offers a Comparable Local Usage Plan.**

SunCom offers a local usage plan that is comparable or superior to those offered by ILECs in the Designated ETC Service Area. Specifically, SunCom's "Un-Plan<sup>SM</sup>" enables customers to place unlimited local and domestic long-distance calls for a flat rate. The Un-Plan also includes voicemail, 3-way calling, call waiting, Caller ID, call forwarding, and on-line account management for no extra charge. In addition, SunCom offers the "SunCom 1000" plan that includes 1,000 minutes of local and domestic long-distance calling (with per-minute charges for additional minutes), including all the other features listed above.

Both of these plans are "comparable" with, although not identical to, plans generally offered by rural and non-rural ILECs in SunCom's area, within the scope of "comparability" as defined in the *ETC Designation Framework Order*.<sup>50/</sup> Both plans give customers access to "a local calling plan that has a different calling area than the local exchange area provided by the LECs in the same region" – *i.e.*, a nationwide calling area, with no

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<sup>48/</sup> *ETC Designation Framework Order*, ¶ 27 and ¶ 69.

<sup>49/</sup> *ETC Designation Framework Order*, ¶ 28 and ¶ 69.

<sup>50/</sup> *ETC Designation Framework Order*, ¶ 33.

distinctions between local and nationwide long-distance minutes.<sup>51/</sup> And the “Un-Plan” gives customers “an unlimited calling plan that bundles local minutes with long distance minutes,” while the SunCom 1000 plan “offers a specified number of free minutes of service within the local service area.”<sup>52/</sup> As in the *Virginia Cellular* and *Highland Cellular* cases, SunCom’s customers are “subjected to fewer toll charges than the customers using the incumbent’s plan” and have “a choice of a variety of local usage plans, [both] of which include[ ] a large volume of minutes.”<sup>53/</sup> SunCom will certify that its local usage offering is comparable to those of the ILECs in connection with its annual reporting obligations to the Commission. <sup>54/</sup>

**6. SunCom Acknowledges That It May Be Required To Provide Equal Access Under Certain Circumstances.**

SunCom acknowledges that the Commission may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the Designated ETC Area. <sup>55/</sup>

**C. Expeditious Grant of This Application is In the Public Interest.**

The public interest is further served by the expeditious grant of this Petition. The Commission has recognized that “excessive delay in the designation of competing providers may hinder the development of competition and the availability of service in may high-cost areas,” and therefore the Commission made a public commitment to resolve ETC petitions within six

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<sup>51/</sup> *Id.*

<sup>52/</sup> *Id.*

<sup>53/</sup> *Id.*, n.86, citing *Virginia Cellular*, 19 FCC Rcd at 1576, ¶ 29; *Highland Cellular*, 19 FCC Rcd at 6433, ¶ 23.

<sup>54/</sup> *Id.*, ¶ 69.

<sup>55/</sup> *Id.*, ¶¶ 35, 69.



months or less after they are filed. [56/](#) The Commission should abide by that commitment, and should expeditiously proceed to grant this petition.

## **V. HIGH COST CERTIFICATION.**

Under Sections 54.313, 54.314, 54.809, and 54.904 of the Commission's Rules , carriers seeking high cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the Commission and the Universal Service Administrative Company ("USAC") as to their compliance with Section 254(e) of the Act. As explained herein, the state commissions for the four states covered by this application do not exercise jurisdiction over CMRS carriers such as SunCom. Therefore, SunCom has submitted its high-cost certification with the Commission and USAC, a copy of which is attached hereto as Exhibit F. SunCom respectfully requests that the Commission issue a finding that SunCom has met the high-cost certification requirement and that SunCom is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.

## **VI. ANTI-DRUG ABUSE CERTIFICATION.**

SunCom certifies that no party to this petition is subject of a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862. See Exhibit F attached hereto.

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[56/](#) *Twelfth Report and Order*, 15 FCC Rcd at ¶ 94 (2000).

## **CONCLUSION**

For the foregoing reasons, SunCom's applications for designation as an ETC in Georgia, North Carolina, Tennessee, and Virginia should be granted expeditiously.

Respectfully submitted,

SUNCOM WIRELESS, INC.

Charles Kallenbach  
Senior Vice President for Legal Affairs  
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(610) 722-4280

By: \_\_\_\_\_  
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555 – 13th St., NW  
Washington, DC 20004  
(202) 637-6462

Counsel for SunCom Wireless, Inc.

June 23, 2005

## Exhibit A: BTAs Served by SunCom

BTA	Market
<hr/>	
	<u>Virginia</u>
104	Danville, VA
	<u>North Carolina</u>
20	Asheville-Hendersonville, NC
62	Burlington, NC
74	Charlotte, NC
141	Fayetteville/Lumberton, NC
165	Goldsboro-Kinston, NC
174	Greensboro, NC
176	Greenville-Washington, NC
189	Hickory-Lenoir, NC
214	Jacksonville, NC
316	New Bern, NC
368	Raleigh-Durham, NC
377	Roanoke Rapids, NC
382	Rocky Mount-Wilson, NC
478	Wilmington, NC
	<u>Georgia</u>
22	Athens, GA
26	Augusta, GA
410	Savannah, GA
	<u>Tennessee</u>
229	Kingsport, TN

## **EXHIBIT B-1**

### **GEORGIA**

**COMMISSIONERS:**

**ROBERT B. BAKER, JR., CHAIRMAN**  
**DAVID L. BURGESS**  
**H. DOUG EVERETT**  
**ANGELA E. SPER**  
**STAN WISE**

**DERON K. PLANNAN**  
**EXECUTIVE DIRECTOR**

**REECE HALLMYER**  
**EXECUTIVE SECRETARY**

## **Georgia Public Service Commission**

**(404) 656-4881**  
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**244 WASHINGTON STREET, S.W.**  
**ATLANTA, GEORGIA 30334-5781**

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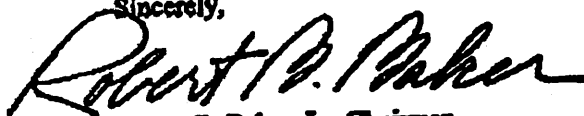
**July 2, 2003**

**To Whom It May Concern:**

In response to a letter filed on April 30, 2003, by ALLTEL Communications, Inc., Georgia RSA #12 Partnership and Georgia RSA #8 Partnership, the Georgia Public Service Commission hereby affirmatively states that the State of Georgia does not exercise jurisdiction over Commercial Mobile Radio Service providers for purposes of making determinations concerning eligibility for Eligible Telecommunications Carrier designations under 47 U.S.C. Section 214(e) and 47 C.F.R. Section 54.201 et seq.

In particular, the Georgia Public Service Commission affirms that ALLTEL Communications, Inc., Georgia RSA #12 Partnership and Georgia RSA #8 Partnership is not subject to jurisdiction of the State of Georgia for purposes of the foregoing determination.

Sincerely,



**Robert B. Baker, Jr., Chairman**  
**Georgia Public Service Commission**

cc: **David L. Burgess, Commissioner, GPSC**  
**H. Doug Everett, Commissioner, GPSC**  
**Angela E. Spelt, Commissioner, GPSC**  
**Stan Wise, Commissioner, GPSC**  
**Tom Bond, Director Utilities Division, GPSC**  
**Leon Bowles, Director Telecommunications, GPSC**

**Kristy Holley, CUC**

**Richard B. Moreland**  
**Government Affairs**  
**ALLTEL Communications**  
**13560 Morris Road**  
**One ALLTEL Center**  
**Alpharetta, GA 30004**

## **EXHIBIT B-2**

### **NORTH CAROLINA**

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. P-100, SUB 133c**

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

<p style="text-align:center"><b>In the Matter of</b></p> <p><b>Designation of Carriers Eligible for Universal Carrier Support</b></p>	<p>) )</p>	<p><b>ORDER GRANTING PETITION</b></p>
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**BY THE COMMISSION:** On May 1, 2003, ALLTEL Communications, Inc. (ALLTEL), a commercial mobile radio service (CMRS) provider, filed a Petition seeking an affirmative declaratory ruling that the Commission lacks jurisdiction to designate CMRS carrier eligible telecommunications carrier (ETC) status for the purposes of receiving federal universal service support.

In support of its Petition, ALLTEL stated that it was a CMRS provider authorized by the Federal Communications Commission (FCC) to provide cellular mobile radio telephone service in North Carolina, and that the FCC had clearly recognized that CMRS carriers such as ALLTEL may be designated as ETCs. ETC status is necessary for a provider to be eligible to receive universal service support. Section 214(e)(6) of the Telecommunications Act provides that if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC is charged with making the ETC determination. The FCC has stated that, in order for the FCC to consider requests pursuant to this provision, a carrier must provide an "affirmative statement" from the state commission or court of competent jurisdiction that the state lacks jurisdiction to perform the designation. To date, several state commissions have declined to exercise such jurisdiction.

North Carolina has excluded CMRS from the definition of "public utility." See, G.S. 62-3(23)j. Pursuant to this, the Commission issued its Order Concerning Deregulation of Wireless Providers in Docket Nos. P-100, Sub 114 and Sub 124 on August 28, 1995, concluding that the Commission no longer has jurisdiction over cellular services. Accordingly, ALLTEL has now requested the Commission to issue an Order stating that it does not have jurisdiction to designate CMRS carriers ETC status for the purposes of receiving federal universal service support.

The Commission requested comments from interested parties.

The Public Staff filed comments on June 3, 2003, in which it stated that it believes that ETC designation by the Commission of CMRS providers is not necessary and may not be appropriate under G.S. 62-3(23)). Thus the Public Staff recommended that the Commission grant ALLTEL's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status for CMRS carriers. This is consistent with the Commission's December 15, 1997 Order in this docket regarding ETC designation for telephone membership corporations.

There were no reply comments filed.

WHEREUPON, the Commission reaches the following

### CONCLUSIONS

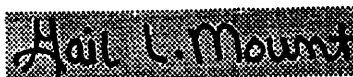
After careful consideration, the Commission concludes that it should grant ALLTEL's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status for CMRS carriers. As noted above, in its August 28, 1995, Order in Docket Nos. P-100, Sub 114 and Sub 124, the Commission noted that G.S. 62-3(23)), enacted on July 29, 1995, has removed cellular services, radio common carriers, personal communications services, and other services then or in the future constituting a mobile radio communications service from the Commission's jurisdiction. 47 USC 3(41) defines a "state commission" as a body which "has regulatory jurisdiction with respect to the intrastate operation of carriers." Pursuant to 47 USC 214(e)(6), if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC must determine which carriers in that class may be designated as ETCs. Given these circumstances, it follows that the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 24<sup>th</sup> day of June, 2003.

NORTH CAROLINA UTILITIES COMMISSION



Gail L. Mount, Deputy Clerk

pt002303.02



**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. P-100, SUB 133c**

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

In the Matter of  
Designation of Carriers Eligible for Universal )  
Carrier Support ) **ORDER GRANTING PETITION**

**BY THE COMMISSION:** On August 22, 2003, North Carolina RSA3 Cellular Telephone Company, d/b/a Carolina West (Carolina West), a commercial mobile radio service (CMRS) provider, filed a Petition seeking an affirmative declaratory ruling that the Commission lacks jurisdiction to designate CMRS carrier eligible telecommunications carrier (ETC) status for the purposes of receiving federal universal service support.

In support of its Petition, Carolina West stated that it was a CMRS provider authorized by the Federal Communications Commission (FCC) to provide cellular mobile radio telephone service in North Carolina, and that the FCC had clearly recognized that CMRS carriers such as Carolina West may be designated as ETCs. ETC status is necessary for a provider to be eligible to receive universal service support. Section 214(e)(6) of the Telecommunications Act provides that if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC is charged with making the ETC determination. The FCC has stated that, in order for the FCC to consider requests pursuant to this provision, a carrier must provide an "affirmative statement" from the state commission or court of competent jurisdiction that the state lacks jurisdiction to perform the designation. To date, several state commissions have declined to exercise such jurisdiction.

North Carolina has excluded CMRS from the definition of "public utility." See, G.S. 62-3(23)). Pursuant to this, the Commission issued its Order Concerning Deregulation of Wireless Providers in Docket Nos. P-100, Sub 114 and Sub 124 on August 28, 1995, concluding that the Commission no longer has jurisdiction over cellular services. Accordingly, Carolina West has now requested the Commission to issue an Order stating that it does not have jurisdiction to designate CMRS carriers ETC status for the purposes of receiving federal universal service support.

**WHEREUPON**, the Commission reaches the following

**CONCLUSIONS**

After careful consideration, the Commission concludes that it should grant Carolina West's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status

for CMRS carriers. As noted above, in its August 28, 1995, Order in Docket Nos. P-100, Sub 114 and Sub 124, the Commission observed that G.S. 62-3(23)), enacted on July 29, 1995, has removed cellular services, radio common carriers, personal communications services, and other services then or in the future constituting a mobile radio communications service from the Commission's jurisdiction. 47 USC 3(41) defines a "state commission" as a body which "has regulatory jurisdiction with respect to the intrastate operation of carriers." Pursuant to 47 USC 214(e)(6), if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC must determine which carriers in that class may be designated as ETCs. Given these circumstances, it follows that the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC. Accord., Order Granting Petition, ALLTEL Communications, Inc., June 24, 2003.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 28th day of August, 2003.

NORTH CAROLINA UTILITIES COMMISSION



Patricia Swenson, Deputy Clerk

pb082503.01

**EXHIBIT B-3**

**TENNESSEE**

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

April 11, 2003

IN RE:

APPLICATION OF ADVANTAGE CELLULAR  
SYSTEMS, INC. TO BE DESIGNATED AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER

DOCKET NO.  
02-01245

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ORDER

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This matter came before Chairman Sara Kyle, Director Deborah Taylor Tate and Director Pat Miller of the Tennessee Regulatory Authority (the "Authority"), the voting panel assigned in this docket, at the regularly scheduled Authority Conference held on January 27, 2003, for consideration of the *Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier* ("Application") filed on November 21, 2002.

**Background**

Advantage Cellular Systems, Inc. ("Advantage") is a commercial mobile radio service provider ("CMRS") seeking designation as an Eligible Telecommunications Carrier ("ETC") by the Authority pursuant to 47 U.S.C. §§ 214 and 254. In its *Application*, Advantage asserts that it seeks ETC status for the entire study area of Dekalb Telephone Cooperative, Inc., a rural cooperative telephone company. Advantage maintains that it meets all the necessary requirements for ETC status and therefore is eligible to receive universal service support throughout its service area.

**The January 27, 2003 Authority Conference**

During the regularly scheduled Authority Conference on January 27, 2003, the panel of Directors assigned to this docket deliberated Advantage's *Application*. Of foremost consideration was the issue of the Authority's jurisdiction. The panel unanimously found that the Authority lacked

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jurisdiction over Advantage for ETC designation purposes.<sup>1</sup>

This conclusion was implicitly premised on Tenn. Code Ann. § 65-4-104, which provides that:

The Authority has general supervisory and regulatory power, jurisdiction and control over all public utilities and also over their property, property rights, facilities, and franchises, so far as may be necessary for the purpose of carrying out the provisions of this chapter.

For purposes of Tenn. Code Ann. § 65-4-104, the definition of public utilities specifically excludes, with certain exceptions not relevant to this case, "[a]ny individual, partnership, copartnership, association, corporation or joint stock company offering domestic public cellular radio telephone service authorized by the federal communications commission."

The Authority's lack of jurisdiction over CMRS providers implicates 47 U.S.C. § 214(e), which addresses the provision of universal service. Where common carriers seeking universal service support are not subject to a state regulatory commission's jurisdiction, 47 U.S.C. § 214(e)(6) authorizes the Federal Communications Commission ("FCC") to perform the ETC designation.<sup>2</sup>

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<sup>1</sup> This finding is not inconsistent with the Authority's decision in *In re: Universal Service Generic Contested Case*, Docket 97-00888, *Interim Order on Phase I of Universal Service*, pp. 53-57 (May 20, 1998), in which the Authority required intrastate telecommunications carriers to contribute to the intrastate Universal Service Fund including telecommunications carriers not subject to authority of the TRA. The decision in Docket No. 97-00888 was based primarily on 47 U.S.C. § 254(f) which authorizes states to adopt regulations not inconsistent with the Federal Communications Commission's rules on Universal Service and specifically requires every telecommunications carrier that provides intrastate telecommunications services to contribute to the preservation and advancement of universal service in that state. The *Interim Order* was issued prior to the effective date of 47 U.S.C. § 214(e)(6).

<sup>2</sup> 47 U.S.C. § 214(e)(6) states:

(6) Common carriers not subject to state commission jurisdiction

In the case of a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission, the Commission shall upon request designate such a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the Commission consistent with applicable Federal and State law. Upon request and consistent with the public interest, convenience and necessity, the Commission may, with respect to an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated under this paragraph, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the Commission shall find that the designation is in the public interest.

As a matter of "state-federal comity," the FCC requires that carriers seeking ETC designation "first consult with the state commission to give the state commission an opportunity to interpret state law."<sup>3</sup> Most carriers that are not subject to a state regulatory commission's jurisdiction seeking ETC designation must provide the FCC "with an affirmative statement from a court of competent jurisdiction or the state commission that it lacks jurisdiction to perform the designation."<sup>4</sup>

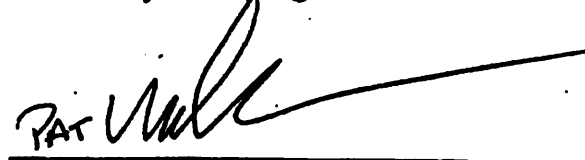
The panel noted that the FCC is the appropriate forum for Advantage to pursue ETC status pursuant to 47 U.S.C. § 214(e)(6). This Order shall serve as the above mentioned affirmative statement required by the FCC.

**IT IS THEREFORE ORDERED THAT:**

*The Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier* is dismissed for lack of subject matter jurisdiction.

  
Sara Kyle, Chairman

  
Deborah Taylor Tate, Director

  
Pat Miller, Director

<sup>3</sup> *In the Matter of Federal-State Joint Bd. on Universal Service*, CC Docket No. 96-45, *Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking*, 15 F.C.C.R. 12208, 12264, ¶ 113 (June 30, 2000).

<sup>4</sup> *See id.* (The "affirmative statement of the state commission may consist of any duly authorized letter, comment, or state commission order indicating that it lacks jurisdiction to perform designations over a particular carrier.")

## **EXHIBIT B-4**

### **VIRGINIA**

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

0204 2 0178

AT RICHMOND, APRIL 9, 2002

COMMONWEALTH OF VIRGINIA, ex rel.<sup>1</sup>

At the relation of the

STATE CORPORATION COMMISSION

CASE NO. PUC970135

Ex Parte, in re: Implementation  
of Requirements of § 214(e) of the  
Telecommunications Act of 1996

IN RE:

APPLICATION OF VIRGINIA CELLULAR LLC

CASE NO. PUC013563

For designation as an eligible  
telecommunications provider under  
47 U.S.C. § 214(e) (2)

ORDER

On September 15, 1997, the State Corporation Commission ("Commission") established the docket in Case No. PUC970135 to consider the requests of local exchange carriers ("LECs") to be designated as eligible telecommunications carriers ("ETC designation") to receive universal service support pursuant to § 214(e) of the Telecommunications Act of 1996, 47 U.S.C. § 251 et seq., ("Act") and associated Federal Regulations.<sup>1</sup> The Commission's exercise of its jurisdiction under § 214(e) (2) of the Act has been to establish a simple and streamlined process for telecommunications carriers to certify their eligibility with a minimum of regulatory burden placed upon each applicant.

<sup>1</sup> 47 C.F.R. § 54.201-207.



All Virginia carriers receiving an ETC designation have merely been required to file an affidavit which, among other matters, certifies that all requirements of the Act for designation are met.<sup>2</sup>

Until the above-captioned Application was filed in Case No. PUC010263 by Virginia Cellular LLC ("Virginia Cellular" or "Applicant") for ETC designation, these proceedings have been uncontested. This is the first application by a Commercial Mobile Radio Service ("CMRS") carrier for ETC designation.<sup>3</sup> Pursuant to the Order Requesting Comments, Objections, or Requests for Hearing, issued by the Commission on January 24, 2002, the Virginia Telecommunications Industry Association ("VTIA") and NTELOS Telephone Inc. ("NTELOS") filed their respective comments and requests for hearing on February 20, 2002. Virginia Cellular filed Reply Comments on March 6, 2002.<sup>4</sup>

The comments of NTELOS and VTIA both contest the sufficiency of the Application and claim Virginia Cellular has

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<sup>2</sup> See Order issued November 21, 1997, in Case No. PUC970135, pp. 2-4 ("November 21, 1997, Order"). Also, the annual certification procedure to comply with 47 C.F.R. §§ 54.313 and 314 has been reduced to filing a form affidavit approved by the Commission in a Preliminary Order, issued August 29, 2001, in Case No. PUC010172.

<sup>3</sup> Virginia Cellular is a CMRS carrier as defined in 47 U.S.C. § 153(27) and is authorized as the "A-band" cellular carrier for the Virginia 6 Rural Service Area, serving the counties of Rockingham, Augusta, Nelson, and Highland and the cities of Harrisonburg, Staunton, and Waynesboro.

<sup>4</sup> On March 4, 2002, Virginia Cellular filed a Consent Motion requesting until March 6, 2002, to file Reply Comments. There being no objection, we now grant the Consent Motion.

failed to demonstrate how the public interest will be served.<sup>5</sup> NTELOS and VTIA each allude in their comments to other expected applications for ETC designation by wireless and CLEC carriers to follow this case of first impression. For that reason, we are asked by VTIA and NTELOS to convene a hearing and establish certain standards for the provisioning of the nine services specified in 47 C.F.R. § 54.101.<sup>6</sup> Each applicant is required to provide these nine services to be eligible for ETC designation.

VTIA further comments that "[i]t is not clear how the designation of Virginia Cellular as an ETC will affect the distribution of Universal Funds to the existing carriers in any given rural exchange area." Virginia Cellular replies that this "macroeconomic concern" need not be addressed with this Application. Rather, the Federal Communications Commission ("FCC") and the Federal State Joint Board on Universal Service

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<sup>5</sup> § 214(e)(2) of the Act requires that an ETC designation in areas served by a rural telephone company be based upon a finding that the designation is in the public interest. The Commission did recognize in its November 21, 1997, Order that any carrier seeking ETC designation in a rural area would have the burden of proving that such designation is in the public interest if challenged. Virginia Cellular is seeking ETC designation in the service territories of the following rural telephone companies: Shenandoah Telephone Company ("Shenandoah"), Clifton Forge Waynesboro Telephone Company ("NTELOS"), New Hope Telephone Company, North River Cooperative, Highland Telephone Cooperative, and Mountain Grove-Williamsville Telephone Company ("MGW").

<sup>6</sup> The nine services required to be offered include: voice grade access to the public switched network; local usage; dual tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll limitation for qualifying low-income consumers. Also, the services must be advertised in appropriate media sources. See In Re: Federal-State Joint Board of Universal Service, Report and Order, CC Docket No. 96-45, ¶ 145 (May 8, 1997) ("Universal Service Report & Order").

are reported by Virginia Cellular to be conducting ongoing proceedings to ensure the solvency of the high-cost support fund.<sup>7</sup> Presumably, VTIA views any public interest served by Virginia Cellular's ETC designation to depend upon whether there would be a consequent diminution of universal service funds.

Virginia Cellular cites the authority of § 214(e)(6) of the Act for this Commission to send Applicant to the FCC for ETC designation if this Commission declines to act on its Application.<sup>8</sup> In its Reply Comments, Virginia Cellular reports that the "FCC has been actively processing ETC applications on behalf of states which have declined to exercise jurisdiction [over CMRS carriers]. Its internal processing time has been six months, and it has met that timeline in almost all of its proceedings [and] . . . most, if not all of the issues raised by the commenters have been previously addressed by the FCC in its prior orders involving applications for ETC status."<sup>9</sup>

The Commission finds that § 214(e)(6) of the Act is applicable to Virginia Cellular's Application as this Commission has not asserted jurisdiction over CMRS carriers and that the

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<sup>7</sup> Reply Comments at p. 5.

<sup>8</sup> Pursuant to § 332(c)(3), 47 U.S.C. § 332(c)(3), state regulation of the entry of or the rates charged by any commercial mobile service or any private mobile service is preempted. The Commission has deregulated all Virginia radio common carriers and cellular mobile radio communications carriers. See Final Order issued October 23, 1995, Case No. PUC950062.

<sup>9</sup> Reply Comments at p. 3.

Applicant should apply to the FCC for ETC designation.<sup>10</sup> The Applicant points out that if Virginia Cellular is designated as an ETC carrier, then the Commission must redefine the service areas of NTELOS and Shenandoah, pursuant to 47 C.F.R.

§ 54.207(c).<sup>11</sup> The Applicant has indicated a willingness to propose a plan to redefine these companies' service areas and may submit such a plan with its application to the FCC for ETC designation.

If necessary, this Commission will participate with the FCC and Federal-State Joint Board in redefining the service areas of NTELOS and Shenandoah for "the purpose of determining universal service obligations and support mechanisms." (47 C.F.R.

§ 54.207(a)).<sup>12</sup> Although the FCC will make the final determination on Virginia Cellular's requests, we need to leave this docket open in case there is additional action we must take with respect to defining the service areas of NTELOS and Shenandoah.<sup>13</sup>

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<sup>10</sup> The action is similar to that taken by the Commission in Case No. PUC010172 in its August 29, 2001, Order that required cooperatives to certify directly with the FCC.

<sup>11</sup> The Commission believes that the service area of MGW does not necessarily need to be redefined if Virginia Cellular is designated as an ETC in that territory. However, if the FCC determines otherwise, the Commission will consider additional action if necessary.

<sup>12</sup> Pursuant to 47 C.F.R. § 54.207(c), if the Applicant proposes to redefine these two companies' service areas, the FCC's procedures require the Commission's agreement on the definitions.

<sup>13</sup> At this juncture, it is unclear whether the Commission will need to address the redefinitions once disaggregation plans are filed at the FCC pursuant to 47 C.F.R. § 54.315(a).

NOW UPON CONSIDERATION of all the pleadings of record and the applicable law, the Commission is of the opinion that Virginia Cellular should request the FCC to grant the requested ETC designation, pursuant to 47 U.S.C. § 214(e) (6).

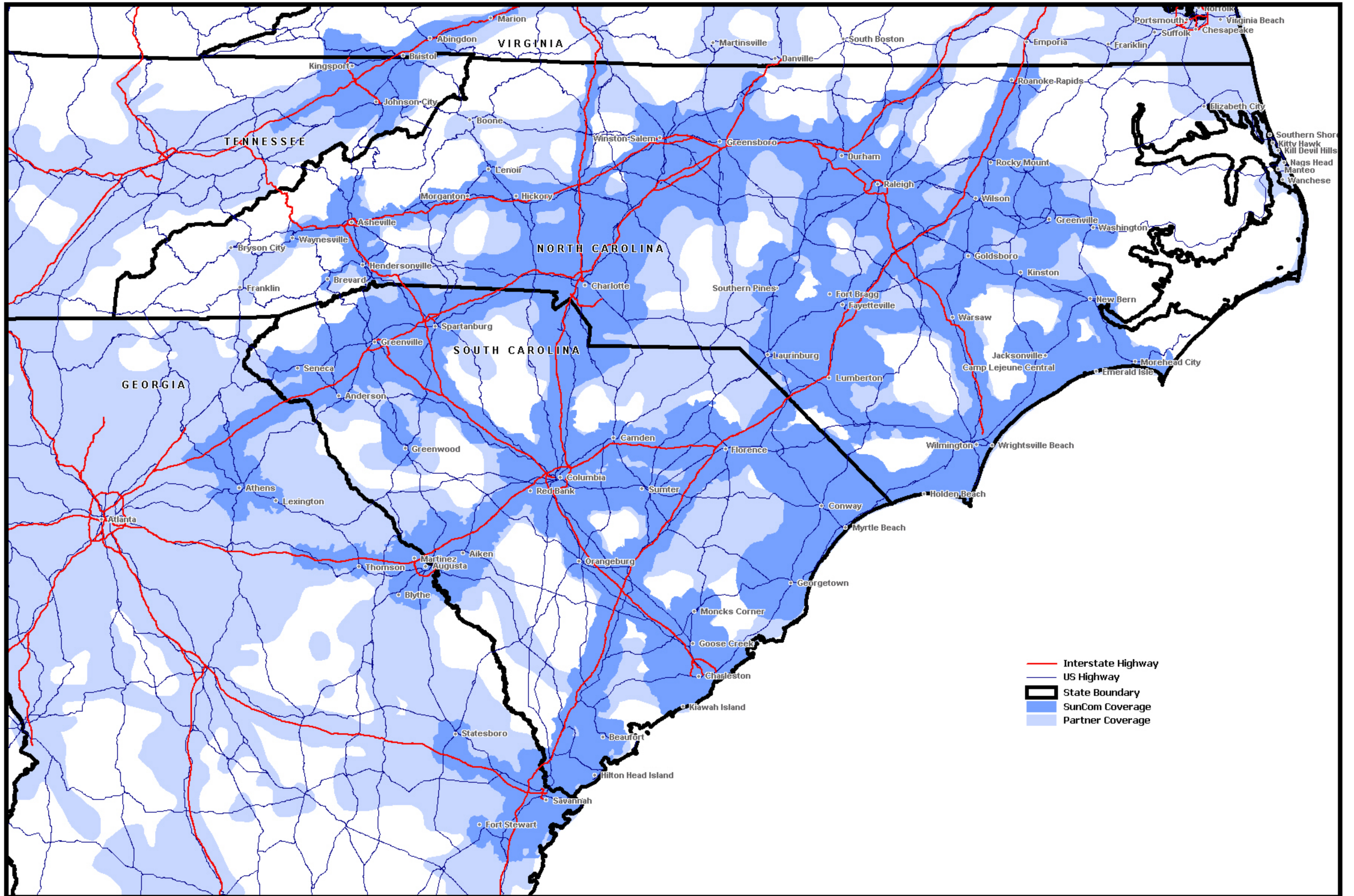
Accordingly, IT IS ORDERED THAT Case No. PUC010263 will remain open for further order of the Commission.

AN ATTESTED COPY hereof shall be sent by the Clerk of the Commission to: all LECs certified in the Commonwealth of Virginia, as set out in Appendix A of this Order; David A. LaFuria, Esquire, Lukas Nace Gutierrez & Sachs, 1111 Nineteenth Street, N.W., Suite 1200, Washington, D.C. 20036; C. Meade Browder, Jr., Senior Assistant Attorney General, Division of Consumer Counsel, Office of Attorney General, 900 East Main Street, Second Floor, Richmond, Virginia 23219; William F. Caton, Acting Secretary, Federal Communications Commission, Office of the Secretary, 445 12th Street, S.W., Washington, D.C. 20554; and the Commission's Office of General Counsel and Division of Communications.

**EXHIBIT C**

**COVERAGE MAP**





## **EXHIBIT D-1**

### **LIST OF NON-RURAL ILEC WIRE CENTERS**



Exhibit D-1 - The non-rural ILEC wire centers for GA, NC, VA and TN

Georgia				North Carolina				Virginia				Tennessee			
SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE
225192	BELLSOUTH - GA	N	ADAIRSVL	235193	BELLSOUTH - NC	N	ACME	195040	Verizon-Virginia, Inc.	N	APPALACHIA	295185	BELLSOUTH - TN	N	ADMSCDARHL
225192	BELLSOUTH - GA	N	ALBANY	235193	BELLSOUTH - NC	N	ANDERSON	195040	Verizon-Virginia, Inc.	N	BIGSTONEGP	295185	BELLSOUTH - TN	N	ARLINGTON
225192	BELLSOUTH - GA	N	AMERICUS	235193	BELLSOUTH - NC	N	APEX	195040	Verizon-Virginia, Inc.	N	CLINCHCO	295185	BELLSOUTH - TN	N	ASHLAND CY
225192	BELLSOUTH - GA	N	APPLING	235193	BELLSOUTH - NC	N	ARDEN	195040	Verizon-Virginia, Inc.	N	CLINTWOOD	295185	BELLSOUTH - TN	N	ATHENS
225192	BELLSOUTH - GA	N	ARLINGTON	235193	BELLSOUTH - NC	N	ASHEVILLE	195040	Verizon-Virginia, Inc.	N	COEBURN	295185	BELLSOUTH - TN	N	BEAN STATN
225192	BELLSOUTH - GA	N	ATHENS	235193	BELLSOUTH - NC	N	ATKINSON	195040	Verizon-Virginia, Inc.	N	CUMBERLDGP	295185	BELLSOUTH - TN	N	BELLS
225192	BELLSOUTH - GA	N	ATLANTA	235193	BELLSOUTH - NC	N	BELMONT	195040	Verizon-Virginia, Inc.	N	DANTE	295185	BELLSOUTH - TN	N	BENTCREEK
225192	BELLSOUTH - GA	N	ATLANTA NE	235193	BELLSOUTH - NC	N	BESSEMER	195040	Verizon-Virginia, Inc.	N	DAVENPORT	295185	BELLSOUTH - TN	N	BENTON
225192	BELLSOUTH - GA	N	ATLANTA NW	235193	BELLSOUTH - NC	N	BLACK MT	195040	Verizon-Virginia, Inc.	N	HAYSJ	295185	BELLSOUTH - TN	N	BETHEL SPG
225192	BELLSOUTH - GA	N	ATLANTA SO	235193	BELLSOUTH - NC	N	BLOWING RK	195040	Verizon-Virginia, Inc.	N	HONAKER	295185	BELLSOUTH - TN	N	BIG SANDY
225192	BELLSOUTH - GA	N	AUGUSTA	235193	BELLSOUTH - NC	N	BOONE	195040	Verizon-Virginia, Inc.	N	JONESVILLE	295185	BELLSOUTH - TN	N	BLANCHE
225192	BELLSOUTH - GA	N	BACONTON	235193	BELLSOUTH - NC	N	BURGAW	195040	Verizon-Virginia, Inc.	N	LEBANON	295185	BELLSOUTH - TN	N	BOLIVAR
225192	BELLSOUTH - GA	N	BAINBRIDGE	235193	BELLSOUTH - NC	N	BURLINGTON	195040	Verizon-Virginia, Inc.	N	NORTON	295185	BELLSOUTH - TN	N	BROWNSVL
225192	BELLSOUTH - GA	N	BARNESVL	235193	BELLSOUTH - NC	N	CANTON	195040	Verizon-Virginia, Inc.	N	PENINGTNGP	295185	BELLSOUTH - TN	N	BULLS GAP
225192	BELLSOUTH - GA	N	BAXLEY	235193	BELLSOUTH - NC	N	CAROLEEN	195040	Verizon-Virginia, Inc.	N	POUND	295185	BELLSOUTH - TN	N	CAMDEN
225192	BELLSOUTH - GA	N	BLACKSHEAR	235193	BELLSOUTH - NC	N	CAROLINBCH	195040	Verizon-Virginia, Inc.	N	ST CHARLES	295185	BELLSOUTH - TN	N	CARTHAGE
225192	BELLSOUTH - GA	N	BOGARTSTHM	235193	BELLSOUTH - NC	N	CARY	195040	Verizon-Virginia, Inc.	N	ST PAUL	295185	BELLSOUTH - TN	N	CEDARGROVE
225192	BELLSOUTH - GA	N	BOWDON	235193	BELLSOUTH - NC	N	CASTLEHAYN	195040	Verizon-Virginia, Inc.	N	WISE	295185	BELLSOUTH - TN	N	CENTERVL
225192	BELLSOUTH - GA	N	BREMEN	235193	BELLSOUTH - NC	N	CHAPELHILL					295185	BELLSOUTH - TN	N	CHARLESTON
225192	BELLSOUTH - GA	N	BRUNSWICK	235193	BELLSOUTH - NC	N	CHARLOTTE					295185	BELLSOUTH - TN	N	CHARLOTTE
225192	BELLSOUTH - GA	N	BUCHANAN	235193	BELLSOUTH - NC	N	CHERRYVL					295185	BELLSOUTH - TN	N	CHATTNOOGA
225192	BELLSOUTH - GA	N	BUFORD	235193	BELLSOUTH - NC	N	CLAREMONT					295185	BELLSOUTH - TN	N	CHESTNUTHI
225192	BELLSOUTH - GA	N	CALHOUN	235193	BELLSOUTH - NC	N	CLEVELAND					295185	BELLSOUTH - TN	N	CLARKSVL
225192	BELLSOUTH - GA	N	CAMILLA	235193	BELLSOUTH - NC	N	CLYDE					295185	BELLSOUTH - TN	N	CLEVELAND
225192	BELLSOUTH - GA	N	CARROLLTON	235193	BELLSOUTH - NC	N	DAVIDSON					295185	BELLSOUTH - TN	N	CLINTON
225192	BELLSOUTH - GA	N	CARTERSVL	235193	BELLSOUTH - NC	N	DENVER					295185	BELLSOUTH - TN	N	COLLIERVL
225192	BELLSOUTH - GA	N	CAVESPRING	235193	BELLSOUTH - NC	N	ELLENBORO					295185	BELLSOUTH - TN	N	COLUMBIA
225192	BELLSOUTH - GA	N	CEDARTOWN	235193	BELLSOUTH - NC	N	ENKACANDLR					295185	BELLSOUTH - TN	N	COPPERBSIN
225192	BELLSOUTH - GA	N	CLAXTON	235193	BELLSOUTH - NC	N	FAIRMONT					295185	BELLSOUTH - TN	N	COVINGTON
225192	BELLSOUTH - GA	N	CLERMONT	235193	BELLSOUTH - NC	N	FAIRVIEW					295185	BELLSOUTH - TN	N	CRSPLORLND
225192	BELLSOUTH - GA	N	COCHRAN	235193	BELLSOUTH - NC	N	FORESTCITY					295185	BELLSOUTH - TN	N	CULLEOKA
225192	BELLSOUTH - GA	N	COLQUITT	235193	BELLSOUTH - NC	N	GASTONIA					295185	BELLSOUTH - TN	N	CUMBERLDY
225192	BELLSOUTH - GA	N	COLUMBUS	235193	BELLSOUTH - NC	N	GIBSON					295185	BELLSOUTH - TN	N	CUMBERLDGP
225192	BELLSOUTH - GA	N	CONCORD	235193	BELLSOUTH - NC	N	GOLDSBORO					295185	BELLSOUTH - TN	N	CUNNINGHAM
225192	BELLSOUTH - GA	N	CONYERS	235193	BELLSOUTH - NC	N	GRANTHAM					295185	BELLSOUTH - TN	N	DANDRIDGE
225192	BELLSOUTH - GA	N	CORDELE	235193	BELLSOUTH - NC	N	GREENSBORO					295185	BELLSOUTH - TN	N	DAYTON
225192	BELLSOUTH - GA	N	COVINGTON	235193	BELLSOUTH - NC	N	GROVER					295185	BELLSOUTH - TN	N	DECATUR
225192	BELLSOUTH - GA	N	CUMMING	235193	BELLSOUTH - NC	N	HAMLET					295185	BELLSOUTH - TN	N	DICKSON
225192	BELLSOUTH - GA	N	CUSSETA	235193	BELLSOUTH - NC	N	HENDERSNVL					295185	BELLSOUTH - TN	N	DOVER
225192	BELLSOUTH - GA	N	DUBLIN	235193	BELLSOUTH - NC	N	HUNTERSVL					295185	BELLSOUTH - TN	N	DYER
225192	BELLSOUTH - GA	N	EASTMAN	235193	BELLSOUTH - NC	N	JULIAN					295185	BELLSOUTH - TN	N	DYERSBURG
225192	BELLSOUTH - GA	N	EATONTON	235193	BELLSOUTH - NC	N	KIMESVILLE					295185	BELLSOUTH - TN	N	EAGLEVILLE
225192	BELLSOUTH - GA	N	ELBERTON	235193	BELLSOUTH - NC	N	KINGS MT					295185	BELLSOUTH - TN	N	EASTSANGO
225192	BELLSOUTH - GA	N	FLOWEYBRCH	235193	BELLSOUTH - NC	N	KNIGHTDALE					295185	BELLSOUTH - TN	N	ELKTON
225192	BELLSOUTH - GA	N	FORSYTH	235193	BELLSOUTH - NC	N	LAKE LURE					295185	BELLSOUTH - TN	N	ETOWAH
225192	BELLSOUTH - GA	N	FORTVALLEY	235193	BELLSOUTH - NC	N	LATTIMORE					295185	BELLSOUTH - TN	N	FAIRVIEW
225192	BELLSOUTH - GA	N	FRANKLIN	235193	BELLSOUTH - NC	N	LAURINBURG					295185	BELLSOUTH - TN	N	FAYETTEVL
225192	BELLSOUTH - GA	N	GAINESVL	235193	BELLSOUTH - NC	N	LAWNDALE					295185	BELLSOUTH - TN	N	FLINTVILLE
225192	BELLSOUTH - GA	N	GAY	235193	BELLSOUTH - NC	N	LEICESTER					295185	BELLSOUTH - TN	N	FORK RIDGE
225192	BELLSOUTH - GA	N	GEORGETOWN	235193	BELLSOUTH - NC	N	LENOIR					295185	BELLSOUTH - TN	N	FRANKLIN
225192	BELLSOUTH - GA	N	GIBSON	235193	BELLSOUTH - NC	N	LIBERTY-CH					295185	BELLSOUTH - TN	N	FREDONIA
225192	BELLSOUTH - GA	N	GRANTVILLE	235193	BELLSOUTH - NC	N	LINCOLNTON					295185	BELLSOUTH - TN	N	GALLATIN
225192	BELLSOUTH - GA	N	GREENSBORO	235193	BELLSOUTH - NC	N	LOCUST					295185	BELLSOUTH - TN	N	GATLINBURG
225192	BELLSOUTH - GA	N	GREENVILLE	235193	BELLSOUTH - NC	N	LONG BEACH					295185	BELLSOUTH - TN	N	GEORGETOWN
225192	BELLSOUTH - GA	N	GRIFFIN	235193	BELLSOUTH - NC	N	LOWELL					295185	BELLSOUTH - TN	N	GIBSON
225192	BELLSOUTH - GA	N	HAMILTON	235193	BELLSOUTH - NC	N	LUMBERTON					295185	BELLSOUTH - TN	N	GLEASON
225192	BELLSOUTH - GA	N	HARLEM	235193	BELLSOUTH - NC	N	MAGGIE VLY					295185	BELLSOUTH - TN	N	GOODLETSVL
225192	BELLSOUTH - GA	N	HAZLEHURST	235193	BELLSOUTH - NC	N	MAIDEN					295185	BELLSOUTH - TN	N	GREENBACK
225192	BELLSOUTH - GA	N	HEPHZIBAH	235193	BELLSOUTH - NC	N	MONTICELLO					295185	BELLSOUTH - TN	N	GREENBRIER
225192	BELLSOUTH - GA	N	HOGANSVL	235193	BELLSOUTH - NC	N	MORGANTON					295185	BELLSOUTH - TN	N	GREENFIELD
225192	BELLSOUTH - GA	N	JACKSON	235193	BELLSOUTH - NC	N	MOUNTHOLLY					295185	BELLSOUTH - TN	N	HALLS
225192	BELLSOUTH - GA	N	JEKYLL IS	235193	BELLSOUTH - NC	N	MOUNTOLIVE					295185	BELLSOUTH - TN	N	HAMPSHIRE
225192	BELLSOUTH - GA	N	JESUP	235193	BELLSOUTH - NC	N	NEULAND					295185	BELLSOUTH - TN	N	HARRIMAN
225192	BELLSOUTH - GA	N	JOHNSONCOR	235193	BELLSOUTH - NC	N	NEWTON					295185	BELLSOUTH - TN	N	HARTSVILLE
225192	BELLSOUTH - GA	N	KINGSTON	235193	BELLSOUTH - NC	N	PEMBROKE					295185	BELLSOUTH - TN	N	HENDERSNVL
225192	BELLSOUTH - GA	N	LAGRANGE	235193	BELLSOUTH - NC	N	RALEIGH					295185	BELLSOUTH - TN	N	HENDERSON
225192	BELLSOUTH - GA	N	LAKE PARK	235193	BELLSOUTH - NC	N	REIDSVILLE					295185	BELLSOUTH - TN	N	HENNING
225192	BELLSOUTH - GA	N	LEARY	235193	BELLSOUTH - NC	N	ROCKINGHAM					295185	BELLSOUTH - TN	N	HOHENWALD
225192	BELLSOUTH - GA	N	LEESBURG	235193	BELLSOUTH - NC	N	ROWLAND					295185	BELLSOUTH - TN	N	HORNBEAK
225192	BELLSOUTH - GA	N	LOUISVILLE	235193	BELLSOUTH - NC	N	RUFFIN					295185	BELLSOUTH - TN	N	HUMBOLDT
225192	BELLSOUTH - GA	N	LULA	235193	BELLSOUTH - NC	N	RUTHEFRDNT					295185	BELLSOUTH - TN	N	HUNTINGDON
225192	BELLSOUTH - GA	N	LUMBERCITY	235193	BELLSOUTH - NC	N	SALISBURY					295185	BELLSOUTH - TN	N	HUNTAND
225192	BELLSOUTH - GA	N	LUMPKIN	235193	BELLSOUTH - NC	N	SAXAPAHAW					295185	BELLSOUTH - TN	N	JACKSON
225192	BELLSOUTH - GA	N	LUTHERSVL	235193	BELLSOUTH - NC	N	SCOTTSHILL					295185	BELLSOUTH - TN	N	JASPER
225192	BELLSOUTH - GA	N	LYONS	235193	BELLSOUTH - NC	N	SCRWDSCRK					295185	BELLSOUTH - TN	N	JEFFERSNRY
225192	BELLSOUTH - GA	N	MACON	235193	BELLSOUTH - NC	N	SELMA					295185	BELLSOUTH - TN	N	JELLICO
225192	BELLSOUTH - GA	N	MADISON	235193	BELLSOUTH - NC	N	SHELBY					295185	BELLSOUTH - TN	N	KENTON
225192	BELLSOUTH - GA	N	MCCAYSVL	235193	BELLSOUTH - NC	N	SOUTHPORT					295185	BELLSOUTH - TN	N	KINGSTNSPG
225192	BELLSOUTH - GA	N	MILLEN	235193	BELLSOUTH - NC	N	SPRUCEPINE					295185	BELLSOUTH - TN	N	KINGSTON
225192	BELLSOUTH - GA	N	MONTICELLO	235193	BELLSOUTH - NC	N	STANLEY					295185	BELLSOUTH - TN	N	KNOXVILLE
225192	BELLSOUTH - GA	N	NEWMAN	235193	BELLSOUTH - NC	N	STATESVL					295185	BELLSOUTH - TN	N	LAFOLETTE
225192	BELLSOUTH - GA	N	NEWTON	235193	BELLSOUTH - NC	N	STONYPOINT					295185	BELLSOUTH - TN	N	LAGRANGE
225192	BELLSOUTH - GA	N	PELHAM	235193	BELLSOUTH - NC	N	SUMMERFLD					295185	BELLSOUTH - TN	N	LAKE CITY
225192	BELLSOUTH - GA	N	PINE MT	235193	BELLSOUTH - NC	N	SWANNANOVA					295185	BELLSOUTH - TN	N	LAWRENCEBEG
225192	BELLSOUTH - GA	N	POOLER	235193	BELLSOUTH - NC	N	TAYLORSVL					295185	BELLSOUTH - TN	N	LEBANON
225192	BELLSOUTH - GA	N	RICHLAND	235193	BELLSOUTH - NC	N	TROUTMAN					295185	BELLSOUTH - TN	N	LENOIRCITY
225192	BELLSOUTH - GA	N	ROCKMART	235193	BELLSOUTH - NC	N	WATERVILLE					295185	BELLSOUTH - TN	N	LEWISBURG
225192	BELLSOUTH - GA	N	ROME	235193	BELLSOUTH - NC	N	WAYNESVL					295185	BELLSOUTH - TN	N	LEXINGTON
225192	BELLSOUTH - GA	N	ROOPVILLE	235193	BELLSOUTH - NC	N	WENDELL					295185	BELLSOUTH - TN	N	LOUDON

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Georgia				North Carolina				Virginia				Tennessee			
SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE
225192	BELLSOUTH - GA	N	ROSSVILLE	235193	BELLSOUTH - NC	N	WILMINGTON					295185	BELLSOUTH - TN	N	LYLES
225192	BELLSOUTH - GA	N	ROYSTON	235193	BELLSOUTH - NC	N	WINSTN SAL					295185	BELLSOUTH - TN	N	LYNCHBURG
225192	BELLSOUTH - GA	N	RUTLEDGE	235193	BELLSOUTH - NC	N	WRGHTSVBCH					295185	BELLSOUTH - TN	N	LYNNVILLE
225192	BELLSOUTH - GA	N	SANDERSVL	235193	BELLSOUTH - NC	N	ZEBULON					295185	BELLSOUTH - TN	N	MADISONVILLE
225192	BELLSOUTH - GA	N	SARDIS	230491	North State Telephone Company	N	HIGH POINT					295185	BELLSOUTH - TN	N	MANCHESTER
225192	BELLSOUTH - GA	N	SAVANNAH	230491	North State Telephone Company	N	RANDLEMAN					295185	BELLSOUTH - TN	N	MARYVILLE
225192	BELLSOUTH - GA	N	SENIOA	230491	North State Telephone Company	N	THOMASVL					295185	BELLSOUTH - TN	N	MASCOT
225192	BELLSOUTH - GA	N	SMITHVILLE	230509	VERIZON SOUTH INC - NC (CONTEL)	N	ANDREWS					295185	BELLSOUTH - TN	N	MAYNARDVL
225192	BELLSOUTH - GA	N	SOCIALCRCL	230509	VERIZON SOUTH INC - NC (CONTEL)	N	BAKERSVL					295185	BELLSOUTH - TN	N	MCEWEN
225192	BELLSOUTH - GA	N	SPARKS	230509	VERIZON SOUTH INC - NC (CONTEL)	N	BRYSONCITY					295185	BELLSOUTH - TN	N	MCKENZIE
225192	BELLSOUTH - GA	N	SPARTA	230509	VERIZON SOUTH INC - NC (CONTEL)	N	BURNSVILLE					295185	BELLSOUTH - TN	N	MEDINA
225192	BELLSOUTH - GA	N	STSIMONIS	230509	VERIZON SOUTH INC - NC (CONTEL)	N	CASHIERS					295185	BELLSOUTH - TN	N	MEMPHIS
225192	BELLSOUTH - GA	N	SWAINSBORO	230509	VERIZON SOUTH INC - NC (CONTEL)	N	CHEROKEE					295185	BELLSOUTH - TN	N	MICHIE
225192	BELLSOUTH - GA	N	SYLVESTER	230509	VERIZON SOUTH INC - NC (CONTEL)	N	CULLOWHEE					295185	BELLSOUTH - TN	N	MIDDLETON
225192	BELLSOUTH - GA	N	TALLAPOOSA	230509	VERIZON SOUTH INC - NC (CONTEL)	N	FONTANAVLG					295185	BELLSOUTH - TN	N	MILAN
225192	BELLSOUTH - GA	N	TEMPLE	230509	VERIZON SOUTH INC - NC (CONTEL)	N	FRANKLIN					295185	BELLSOUTH - TN	N	MORRISTOWN
225192	BELLSOUTH - GA	N	TENNGA	230509	VERIZON SOUTH INC - NC (CONTEL)	N	GARDENCITY					295185	BELLSOUTH - TN	N	MOSCOW
225192	BELLSOUTH - GA	N	THOMASVL	230509	VERIZON SOUTH INC - NC (CONTEL)	N	GLENWDPDNC					295185	BELLSOUTH - TN	N	MTPLEASANT
225192	BELLSOUTH - GA	N	THOMSON	230509	VERIZON SOUTH INC - NC (CONTEL)	N	GUNTERTOWN					295185	BELLSOUTH - TN	N	MURFREESBO
225192	BELLSOUTH - GA	N	TIFTON	230509	VERIZON SOUTH INC - NC (CONTEL)	N	HAYESVILLE					295185	BELLSOUTH - TN	N	NASHVILLE
225192	BELLSOUTH - GA	N	TYBEE IS	230509	VERIZON SOUTH INC - NC (CONTEL)	N	HIGHLANDS					295185	BELLSOUTH - TN	N	NEWBERN
225192	BELLSOUTH - GA	N	VALDOSTA	230509	VERIZON SOUTH INC - NC (CONTEL)	N	HOTSPRINGS					295185	BELLSOUTH - TN	N	NEWPORT
225192	BELLSOUTH - GA	N	VIDALIA	230509	VERIZON SOUTH INC - NC (CONTEL)	N	MARION					295185	BELLSOUTH - TN	N	NORMANDY
225192	BELLSOUTH - GA	N	VILLA RICA	230509	VERIZON SOUTH INC - NC (CONTEL)	N	MARS HILL					295185	BELLSOUTH - TN	N	NORRIS
225192	BELLSOUTH - GA	N	WADLEY	230509	VERIZON SOUTH INC - NC (CONTEL)	N	MARSHALL					295185	BELLSOUTH - TN	N	NSPRINGHIL
225192	BELLSOUTH - GA	N	WARNERRBNS	230509	VERIZON SOUTH INC - NC (CONTEL)	N	MICAVILLE					295185	BELLSOUTH - TN	N	OAK RIDGE
225192	BELLSOUTH - GA	N	WARRENTON	230509	VERIZON SOUTH INC - NC (CONTEL)	N	MURPHY					295185	BELLSOUTH - TN	N	OLDHICKORY
225192	BELLSOUTH - GA	N	WATKINSVL	230509	VERIZON SOUTH INC - NC (CONTEL)	N	OLD FORT					295185	BELLSOUTH - TN	N	OLIVER SPG
225192	BELLSOUTH - GA	N	WAYCROSS	230509	VERIZON SOUTH INC - NC (CONTEL)	N	ROBINSVL					295185	BELLSOUTH - TN	N	PALMYRA
225192	BELLSOUTH - GA	N	WAYNESBORO	230509	VERIZON SOUTH INC - NC (CONTEL)	N	SEVIER					295185	BELLSOUTH - TN	N	PARIS
225192	BELLSOUTH - GA	N	WOODBURY	230509	VERIZON SOUTH INC - NC (CONTEL)	N	SUIT					295185	BELLSOUTH - TN	N	PETERSBURG
225192	BELLSOUTH - GA	N	WRENS	230509	VERIZON SOUTH INC - NC (CONTEL)	N	SYLVA					295185	BELLSOUTH - TN	N	PLEASANTVW
225192	BELLSOUTH - GA	N	WRIGHTSVL	230509	VERIZON SOUTH INC - NC (CONTEL)	N	WEAVERVL					295185	BELLSOUTH - TN	N	PORTLAND
225192	BELLSOUTH - GA	N	ZEBULON	230479	VERIZON SOUTH INC - NC	N	ALTON					295185	BELLSOUTH - TN	N	PULASKI
				230479	VERIZON SOUTH INC - NC	N	ALTON					295185	BELLSOUTH - TN	N	RIDGELY
				230479	VERIZON SOUTH INC - NC	N	CREEDMOOR					295185	BELLSOUTH - TN	N	RIPLEY
				230479	VERIZON SOUTH INC - NC	N	DURHAM					295185	BELLSOUTH - TN	N	ROCKWOOD
				230479	VERIZON SOUTH INC - NC	N	DURHAM					295185	BELLSOUTH - TN	N	ROGERSVL
				230479	VERIZON SOUTH INC - NC	N	GOOSECREEK					295185	BELLSOUTH - TN	N	SANGO
				230479	VERIZON SOUTH INC - NC	N	MONROE					295185	BELLSOUTH - TN	N	SANTA FE
				230479	VERIZON SOUTH INC - NC	N	MONROE					295185	BELLSOUTH - TN	N	SAVANNAH
												295185	BELLSOUTH - TN	N	SCUNNINGHA
												295185	BELLSOUTH - TN	N	SELMER
												295185	BELLSOUTH - TN	N	SEVIERVL
												295185	BELLSOUTH - TN	N	SEWANEE
												295185	BELLSOUTH - TN	N	SHELBYVL
												295185	BELLSOUTH - TN	N	SMYRNA
												295185	BELLSOUTH - TN	N	SNEEDVILLE
												295185	BELLSOUTH - TN	N	SO FULTON
												295185	BELLSOUTH - TN	N	SO GUTHRIE
												295185	BELLSOUTH - TN	N	SO PITTSBG
												295185	BELLSOUTH - TN	N	SODDYDAISY
												295185	BELLSOUTH - TN	N	SOFREDONIA
												295185	BELLSOUTH - TN	N	SOLWAY
												295185	BELLSOUTH - TN	N	SOMERVILLE
												295185	BELLSOUTH - TN	N	SOOAKGROVE
												295185	BELLSOUTH - TN	N	SPENCERMIL
												295185	BELLSOUTH - TN	N	SPRINGCITY
												295185	BELLSOUTH - TN	N	SPRINGFLD
												295185	BELLSOUTH - TN	N	SPRINGHILL
												295185	BELLSOUTH - TN	N	SUMMERTOWN
												295185	BELLSOUTH - TN	N	SURGOINSVL
												295185	BELLSOUTH - TN	N	SWEETWATER
												295185	BELLSOUTH - TN	N	TIPTONVL
												295185	BELLSOUTH - TN	N	TRENTON
												295185	BELLSOUTH - TN	N	TRIUNE
												295185	BELLSOUTH - TN	N	TROY
												295185	BELLSOUTH - TN	N	TULLAHOA
												295185	BELLSOUTH - TN	N	UNION CITY
												295185	BELLSOUTH - TN	N	VANLEER
												295185	BELLSOUTH - TN	N	WARTRACE
												295185	BELLSOUTH - TN	N	WATERTOWN
												295185	BELLSOUTH - TN	N	WAVERLY
												295185	BELLSOUTH - TN	N	WESTSWEE TW
												295185	BELLSOUTH - TN	N	WHITE PINE
												295185	BELLSOUTH - TN	N	WHITEBLUFF
												295185	BELLSOUTH - TN	N	WHITEHOUSE
												295185	BELLSOUTH - TN	N	WHITEVILLE
												295185	BELLSOUTH - TN	N	WHITWEL
												295185	BELLSOUTH - TN	N	WILLIAMSPT
												295185	BELLSOUTH - TN	N	WINCHESTER

## **EXHIBIT D-2**

### **LIST OF RURAL ILEC STUDY AREAS**

Exhibit D-2 - The entirety of each of the rural ILEC study areas for GA, NC VA and TN

Georgia				North Carolina				Virginia				Tennessee			
SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE
223037	AltTel Georgia Communication Corp.	R	ABBEVILLE	230476	AltTel Carolina Inc. - North	R	ABERDEEN	190248	Scott County Tel. Coop.	R	CLINCHPORT	290557	CenturyTel of Claiborne, Inc.	R	NEWTAEZELL
223037	AltTel Georgia Communication Corp.	R	ABEL	230476	AltTel Carolina Inc. - North	R	ANSONVILLE	190248	Scott County Tel. Coop.	R	DUFFIELD	290557	CenturyTel of Claiborne, Inc.	R	SHARPSCHPL
223037	AltTel Georgia Communication Corp.	R	ALAPAHA	230476	AltTel Carolina Inc. - North	R	BROADWAY	190248	Scott County Tel. Coop.	R	DUNGANNON	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	BAILEYTON
223037	AltTel Georgia Communication Corp.	R	ASHBURN	230476	AltTel Carolina Inc. - North	R	COLUMBUS	190248	Scott County Tel. Coop.	R	FT BLACKMR	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	BLOUNTVA
223037	AltTel Georgia Communication Corp.	R	BARWICK	230476	AltTel Carolina Inc. - North	R	DENTON	190248	Scott County Tel. Coop.	R	NICKELSVL	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	BLUFF CITY
223037	AltTel Georgia Communication Corp.	R	BERLIN	230476	AltTel Carolina Inc. - North	R	GREENCREEK	190248	Scott County Tel. Coop.	R	WILLIAMSM	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	BRISTOL
223037	AltTel Georgia Communication Corp.	R	BLUFFTON	230476	AltTel Carolina Inc. - North	R	GRTORRCKWL	190567	SPRINT / UNITED SOUTHEAST-VA	R	ABINGDON	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	BUTLER
223037	AltTel Georgia Communication Corp.	R	BOSTON	230476	AltTel Carolina Inc. - North	R	HEMBY BDG	190567	SPRINT / UNITED SOUTHEAST-VA	R	BRISTOL	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	CHURCHHILL
223037	AltTel Georgia Communication Corp.	R	BROXTON	230476	AltTel Carolina Inc. - North	R	INDIANTRAL	190567	SPRINT / UNITED SOUTHEAST-VA	R	CHILHOWIE	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	ELIZABHTN
223037	AltTel Georgia Communication Corp.	R	BUENAVISTA	230476	AltTel Carolina Inc. - North	R	KING	190567	SPRINT / UNITED SOUTHEAST-VA	R	DAMASCUS	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	ERWIN
223037	AltTel Georgia Communication Corp.	R	BYROMVILLE	230476	AltTel Carolina Inc. - North	R	LAURELHILL	190567	SPRINT / UNITED SOUTHEAST-VA	R	GATE CITY	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	FALLBRANCH
223037	AltTel Georgia Communication Corp.	R	CANTON	230476	AltTel Carolina Inc. - North	R	LEWISVILLE	190567	SPRINT / UNITED SOUTHEAST-VA	R	GLADE SPG	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	GREENEVL
223037	AltTel Georgia Communication Corp.	R	CARNESVL	230476	AltTel Carolina Inc. - North	R	LILESVILLE	190567	SPRINT / UNITED SOUTHEAST-VA	R	KONNAROCK	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	HAMPTON
223037	AltTel Georgia Communication Corp.	R	CHATSORTH	230476	AltTel Carolina Inc. - North	R	MARSHVILLE	190567	SPRINT / UNITED SOUTHEAST-VA	R	MARION	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	JOHNSON CY
223037	AltTel Georgia Communication Corp.	R	COHUTTA	230476	AltTel Carolina Inc. - North	R	MATTHEWS	190567	SPRINT / UNITED SOUTHEAST-VA	R	MEADOWVIEW	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	JONESBORO
223037	AltTel Georgia Communication Corp.	R	COOLIDGE	230476	AltTel Carolina Inc. - North	R	MOORESVL	190567	SPRINT / UNITED SOUTHEAST-VA	R	MORRISONCY	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	KINGSFORT
223037	AltTel Georgia Communication Corp.	R	CUTHBERT	230476	AltTel Carolina Inc. - North	R	MORVEN	190567	SPRINT / UNITED SOUTHEAST-VA	R	MOUTHWILSN	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	LIMESTONE
223037	AltTel Georgia Communication Corp.	R	DALTON	230476	AltTel Carolina Inc. - North	R	NEW SALEM	190567	SPRINT / UNITED SOUTHEAST-VA	R	RICHVALLEY	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	MIDWAY SUL
223037	AltTel Georgia Communication Corp.	R	DAWSON	230476	AltTel Carolina Inc. - North	R	NORWOOD	190567	SPRINT / UNITED SOUTHEAST-VA	R	SALTVILLE	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	MIDWAY WA
223037	AltTel Georgia Communication Corp.	R	DOERUN	230476	AltTel Carolina Inc. - North	R	OLDTOWN	190567	SPRINT / UNITED SOUTHEAST-VA	R	SUGARGROVE	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	MOSHEIM
223037	AltTel Georgia Communication Corp.	R	DOUGLAS	230476	AltTel Carolina Inc. - North	R	OLIVIA	190479	VERIZON SOUTH INC - VA	R	RICHLANDS	290567	UNITED TELEPHONE INTER-MOUNTAIN	R	MOUNTAINCY
223037	AltTel Georgia Communication Corp.	R	EASTANOLLE	230476	AltTel Carolina Inc. - North	R	PEACHLPKTN					290567	UNITED TELEPHONE INTER-MOUNTAIN	R	ROAN MT
223037	AltTel Georgia Communication Corp.	R	EDISON	230476	AltTel Carolina Inc. - North	R	PINEBLUFF					290567	UNITED TELEPHONE INTER-MOUNTAIN	R	STONEY CRK
223037	AltTel Georgia Communication Corp.	R	ELLAVILLE	230476	AltTel Carolina Inc. - North	R	RURAL HALL					290567	UNITED TELEPHONE INTER-MOUNTAIN	R	SULIVNGDNS
223037	AltTel Georgia Communication Corp.	R	ENIGMA	230476	AltTel Carolina Inc. - North	R	SANFORD								
223037	AltTel Georgia Communication Corp.	R	FITZGERALD	230476	AltTel Carolina Inc. - North	R	STANLEYVL								
223037	AltTel Georgia Communication Corp.	R	FORTGAINES	230476	AltTel Carolina Inc. - North	R	TRYON								
223037	AltTel Georgia Communication Corp.	R	FUNSTON	230476	AltTel Carolina Inc. - North	R	WADESBOBO								
223037	AltTel Georgia Communication Corp.	R	HAHRA	230476	AltTel Carolina Inc. - North	R	WAGRAM								
223037	AltTel Georgia Communication Corp.	R	IDEAL	230476	AltTel Carolina Inc. - North	R	WAXHAW								
223037	AltTel Georgia Communication Corp.	R	IRWINVILLE	230476	AltTel Carolina Inc. - North	R	WINGATE								
223037	AltTel Georgia Communication Corp.	R	JACKSONVL	230468	Atlantic Tel. Membership Corp.	R	BLNGSPGLKS								
223037	AltTel Georgia Communication Corp.	R	JASPER	230468	Atlantic Tel. Membership Corp.	R	BOLIVIA								
223037	AltTel Georgia Communication Corp.	R	LAKELAND	230468	Atlantic Tel. Membership Corp.	R	HOLDEN BCH								
223037	AltTel Georgia Communication Corp.	R	LAVONIA	230468	Atlantic Tel. Membership Corp.	R	LONGWOOD								
223037	AltTel Georgia Communication Corp.	R	LYERLY	230468	Atlantic Tel. Membership Corp.	R	SEASIDE								
223037	AltTel Georgia Communication Corp.	R	MANCHESTER	230468	Atlantic Tel. Membership Corp.	R	SHALLOTTE								
223037	AltTel Georgia Communication Corp.	R	MARSHALLVL	230469	Barnardsville Tel. Co. dba TDS Telecom	R	BARNARDSVL								
223037	AltTel Georgia Communication Corp.	R	MCRAE	230473	Citizens Tel. Co.	R	BREVAR								
223037	AltTel Georgia Communication Corp.	R	MEIGS	230478	Ellerbe Telephone Company	R	ELLERBE								
223037	AltTel Georgia Communication Corp.	R	MENLO	230483	Lexcom Telephone Co.	R	LEXINGTON								
223037	AltTel Georgia Communication Corp.	R	MILLEDGEVL	230483	Lexcom Telephone Co.	R	SOUTHMONT								
223037	AltTel Georgia Communication Corp.	R	MONROE	230483	Lexcom Telephone Co.	R	WELCOME								
223037	AltTel Georgia Communication Corp.	R	MONTEZUMA	230485	MebTel, Inc.	R	MEBANE								
223037	AltTel Georgia Communication Corp.	R	MORGAN	230497	Piedmont Telephone Membership Corp.	R	CHURCHLAND								
223037	AltTel Georgia Communication Corp.	R	MORVEN	230497	Piedmont Telephone Membership Corp.	R	REEDS								
223037	AltTel Georgia Communication Corp.	R	MOULTRIE	230494	Pineville Tel. Co.	R	PINEVILLE								
223037	AltTel Georgia Communication Corp.	R	MT VERNON	230495	Randolph Tel. Co.	R	LIBERTY-RA								
223037	AltTel Georgia Communication Corp.	R	NASHVILLE	230496	Randolph Tel. Membership Corp.	R	BADIN LAKE								
223037	AltTel Georgia Communication Corp.	R	NORMANPARK	230496	Randolph Tel. Membership Corp.	R	BENNETT								
223037	AltTel Georgia Communication Corp.	R	OCILLA	230496	Randolph Tel. Membership Corp.	R	COLERIDGE								
223037	AltTel Georgia Communication Corp.	R	PARROTT	230496	Randolph Tel. Membership Corp.	R	FARMER								
223037	AltTel Georgia Communication Corp.	R	PAVO	230496	Randolph Tel. Membership Corp.	R	HIGHFALLS								
223037	AltTel Georgia Communication Corp.	R	PERRY	230496	Randolph Tel. Membership Corp.	R	JACKSONCRK								
223037	AltTel Georgia Communication Corp.	R	PRESTON	230496	Randolph Tel. Membership Corp.	R	PISGAH								
223037	AltTel Georgia Communication Corp.	R	QUITMAN	230498	Saluda Mountain Tel. Co. dba TDS Telecom	R	SALUDA								
223037	AltTel Georgia Communication Corp.	R	RAY CITY	230500	Service Tel. Co. dba TDS Telecom	R	FAIR BLUFF								
223037	AltTel Georgia Communication Corp.	R	SASSER	230501	Skyline Tel. Membership Corp.	R	BALDWIN								
223037	AltTel Georgia Communication Corp.	R	SHELLMAN	230501	Skyline Tel. Membership Corp.	R	BANNER ELK								
223037	AltTel Georgia Communication Corp.	R	SUMMERVL	230501	Skyline Tel. Membership Corp.	R	BEECH MT								
223037	AltTel Georgia Communication Corp.	R	TOCCOA	230501	Skyline Tel. Membership Corp.	R	CRESTON								
223037	AltTel Georgia Communication Corp.	R	TRION	230501	Skyline Tel. Membership Corp.	R	GLADECREEK								
223037	AltTel Georgia Communication Corp.	R	TUNNELHILL	230501	Skyline Tel. Membership Corp.	R	LANSING								
223037	AltTel Georgia Communication Corp.	R	UNADILLA	230501	Skyline Tel. Membership Corp.	R	NATHANSCRK								
223037	AltTel Georgia Communication Corp.	R	WARM SPG	230501	Skyline Tel. Membership Corp.	R	SCOTTVILLE								
223037	AltTel Georgia Communication Corp.	R	WINDER	230501	Skyline Tel. Membership Corp.	R	SPARTA								
223037	AltTel Georgia Communication Corp.	R	WOODLAND	230501	Skyline Tel. Membership Corp.	R	SUGARGROVE								
220357	AltTel Georgia Inc.	R	BRASELTON	230501	Skyline Tel. Membership Corp.	R	WATAUGA								
220357	AltTel Georgia Inc.	R	BYRON	230470	Sprint/Carolina Telephone & Telegraph C	R	ANGIER								
220357	AltTel Georgia Inc.	R	CAIRO	230470	Sprint/Carolina Telephone & Telegraph C	R	ATLANTIC								
220357	AltTel Georgia Inc.	R	CALVAYRENO	230470	Sprint/Carolina Telephone & Telegraph C	R	AULANDER								
220357	AltTel Georgia Inc.	R	CARTON	230470	Sprint/Carolina Telephone & Telegraph C	R	AURORA								
220357	AltTel Georgia Inc.	R	CENTERVL	230470	Sprint/Carolina Telephone & Telegraph C	R	AYDEN								
220357	AltTel Georgia Inc.	R	COLBERT	230470	Sprint/Carolina Telephone & Telegraph C	R	BAILEY								
220357	AltTel Georgia Inc.	R	COMER	230470	Sprint/Carolina Telephone & Telegraph C	R	BATH								
220357	AltTel Georgia Inc.	R	COMMERCE	230470	Sprint/Carolina Telephone & Telegraph C	R	BAYBORO								
220357	AltTel Georgia Inc.	R	DANIELSVL	230470	Sprint/Carolina Telephone & Telegraph C	R	BEAUFORT								
220357	AltTel Georgia Inc.	R	HOMER	230470	Sprint/Carolina Telephone & Telegraph C	R	BELHAVEN								
220357	AltTel Georgia Inc.	R	ILA	230470	Sprint/Carolina Telephone & Telegraph C	R	BENSON								
220357	AltTel Georgia Inc.	R	JEFFERSON	230470	Sprint/Carolina Telephone & Telegraph C	R	BETHEL								
220357	AltTel Georgia Inc.	R	LEXINGTON	230470	Sprint/Carolina Telephone & Telegraph C	R	BEULAVILLE								
220357	AltTel Georgia Inc.	R	MAXEYS	230470	Sprint/Carolina Telephone & Telegraph C	R	BLADENBORO								
220357	AltTel Georgia Inc.	R	MAYSVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	BONLEE								
220357	AltTel Georgia Inc.	R	NICHOLSON	230470	Sprint/Carolina Telephone & Telegraph C	R	BUXTON								
220357	AltTel Georgia Inc.	R	PENDERGRSS	230470	Sprint/Carolina Telephone & Telegraph C	R	CARTHAGE								
220357	AltTel Georgia Inc.	R	UNIONPOINT	230470	Sprint/Carolina Telephone & Telegraph C	R	CHADBOURN								
220357	AltTel Georgia Inc.	R	WHITE PL	230470	Sprint/Carolina Telephone & Telegraph C	R	CLARKTON								

Exhibit D-2 - The entirety of each of the rural ILEC study areas for GA, NC VA and TN

Georgia				North Carolina				Virginia				Tennessee			
SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE
220357	Alltel Georgia Inc.	R	WINTERVL	230470	Sprint/Carolina Telephone & Telegraph C	R	CLAYTON								
220348	Bulloch County Rural Tel. Coop. Inc.	R	ANDERSON	230470	Sprint/Carolina Telephone & Telegraph C	R	CLINTON								
220348	Bulloch County Rural Tel. Coop. Inc.	R	BROOKLET	230470	Sprint/Carolina Telephone & Telegraph C	R	COLERAIRN								
220348	Bulloch County Rural Tel. Coop. Inc.	R	CLITO	230470	Sprint/Carolina Telephone & Telegraph C	R	COLUMBIA								
220348	Bulloch County Rural Tel. Coop. Inc.	R	NEVILS	230470	Sprint/Carolina Telephone & Telegraph C	R	CONWAY								
220348	Bulloch County Rural Tel. Coop. Inc.	R	PORTAL	230470	Sprint/Carolina Telephone & Telegraph C	R	CRESWELL								
220348	Bulloch County Rural Tel. Coop. Inc.	R	STILSON	230470	Sprint/Carolina Telephone & Telegraph C	R	DUNN								
220356	Coastal Utilities Inc.	R	HINESVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	ELIZABTHTN								
220356	Coastal Utilities Inc.	R	Keller	230470	Sprint/Carolina Telephone & Telegraph C	R	ELM CITY								
220356	Coastal Utilities Inc.	R	MIDWAY	230470	Sprint/Carolina Telephone & Telegraph C	R	ENFIELD								
220356	Coastal Utilities Inc.	R	RICHMONDHL	230470	Sprint/Carolina Telephone & Telegraph C	R	ENGELHARD								
220362	Frontier Communications of Fairmount, LLC	R	FAIRMOUNT	230470	Sprint/Carolina Telephone & Telegraph C	R	FAISON								
220362	Frontier Communications of Fairmount, LLC	R	RANGER	230470	Sprint/Carolina Telephone & Telegraph C	R	FARMVILLE								
220387	Frontier Communications of Georgia, LLC	R	REGISTER	230470	Sprint/Carolina Telephone & Telegraph C	R	FAYETTEVL								
220387	Frontier Communications of Georgia, LLC	R	STATESBORO	230470	Sprint/Carolina Telephone & Telegraph C	R	FOUNTAIN								
220306	Georgia Alltel Telecom, Inc.	R	ALAMO	230470	Sprint/Carolina Telephone & Telegraph C	R	FOUR OAKS								
220306	Georgia Alltel Telecom, Inc.	R	CLAYTON	230470	Sprint/Carolina Telephone & Telegraph C	R	FRANKLINTN								
220306	Georgia Alltel Telecom, Inc.	R	COLLINS	230470	Sprint/Carolina Telephone & Telegraph C	R	FREMONT								
220306	Georgia Alltel Telecom, Inc.	R	DANVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	FUQUAYVRIN								
220306	Georgia Alltel Telecom, Inc.	R	DILLRDMTCY	230470	Sprint/Carolina Telephone & Telegraph C	R	GARLAND								
220306	Georgia Alltel Telecom, Inc.	R	DONALSONVL	230470	Sprint/Carolina Telephone & Telegraph C	R	GIBSONVL								
220306	Georgia Alltel Telecom, Inc.	R	FARGO	230470	Sprint/Carolina Telephone & Telegraph C	R	GOLDSTON								
220306	Georgia Alltel Telecom, Inc.	R	FOLKSTON	230470	Sprint/Carolina Telephone & Telegraph C	R	GREENVILLE								
220306	Georgia Alltel Telecom, Inc.	R	GLENNVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	GRIFFON								
220306	Georgia Alltel Telecom, Inc.	R	GRAY	230470	Sprint/Carolina Telephone & Telegraph C	R	HALIFAX								
220306	Georgia Alltel Telecom, Inc.	R	HADDOCK	230470	Sprint/Carolina Telephone & Telegraph C	R	HAMILTON								
220306	Georgia Alltel Telecom, Inc.	R	HOMERVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	HAVELOCK								
220306	Georgia Alltel Telecom, Inc.	R	IRON CITY	230470	Sprint/Carolina Telephone & Telegraph C	R	HENDERSON								
220306	Georgia Alltel Telecom, Inc.	R	JAKW	230470	Sprint/Carolina Telephone & Telegraph C	R	HOLLYRIDGE								
220306	Georgia Alltel Telecom, Inc.	R	JEFFERSSVL	230470	Sprint/Carolina Telephone & Telegraph C	R	JACKSON								
220306	Georgia Alltel Telecom, Inc.	R	KENSINGTON	230470	Sprint/Carolina Telephone & Telegraph C	R	JACKSONVL								
220306	Georgia Alltel Telecom, Inc.	R	LA FAYETTE	230470	Sprint/Carolina Telephone & Telegraph C	R	KENANSVL								
220306	Georgia Alltel Telecom, Inc.	R	LKSNCLAIR	230470	Sprint/Carolina Telephone & Telegraph C	R	KENLY								
220306	Georgia Alltel Telecom, Inc.	R	LUDOWICK	230470	Sprint/Carolina Telephone & Telegraph C	R	KERNERSVL								
220306	Georgia Alltel Telecom, Inc.	R	MILAN	230470	Sprint/Carolina Telephone & Telegraph C	R	KINSTON								
220306	Georgia Alltel Telecom, Inc.	R	MONTROSE	230470	Sprint/Carolina Telephone & Telegraph C	R	LA GRANGE								
220306	Georgia Alltel Telecom, Inc.	R	NOBLE	230470	Sprint/Carolina Telephone & Telegraph C	R	LEWISTON								
220306	Georgia Alltel Telecom, Inc.	R	ODUM	230470	Sprint/Carolina Telephone & Telegraph C	R	LILLINGTON								
220306	Georgia Alltel Telecom, Inc.	R	PINEVIEW	230470	Sprint/Carolina Telephone & Telegraph C	R	LITTLETON								
220306	Georgia Alltel Telecom, Inc.	R	PITTS	230470	Sprint/Carolina Telephone & Telegraph C	R	LKWACCAMAW								
220306	Georgia Alltel Telecom, Inc.	R	REBECCA	230470	Sprint/Carolina Telephone & Telegraph C	R	LOUISBURG								
220306	Georgia Alltel Telecom, Inc.	R	REIDSVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	LUCAMA								
220306	Georgia Alltel Telecom, Inc.	R	REYNOLDSVL	230470	Sprint/Carolina Telephone & Telegraph C	R	MAMIE								
220306	Georgia Alltel Telecom, Inc.	R	RHINE	230470	Sprint/Carolina Telephone & Telegraph C	R	MARSHALLBG								
220306	Georgia Alltel Telecom, Inc.	R	RINCON	230470	Sprint/Carolina Telephone & Telegraph C	R	MAXTON								
220306	Georgia Alltel Telecom, Inc.	R	ROCHELLE	230470	Sprint/Carolina Telephone & Telegraph C	R	MAYSVILLE								
220306	Georgia Alltel Telecom, Inc.	R	SCREVEN	230470	Sprint/Carolina Telephone & Telegraph C	R	MOREHEADCY								
220306	Georgia Alltel Telecom, Inc.	R	SPRINGFLD	230470	Sprint/Carolina Telephone & Telegraph C	R	MOSS HILL								
220306	Georgia Alltel Telecom, Inc.	R	ST GEORGE	230470	Sprint/Carolina Telephone & Telegraph C	R	MURFREESBO								
220306	Georgia Alltel Telecom, Inc.	R	SYLVANIA	230470	Sprint/Carolina Telephone & Telegraph C	R	NASHVILLE								
220306	Georgia Alltel Telecom, Inc.	R	THOMASTON	230470	Sprint/Carolina Telephone & Telegraph C	R	NEW BERN								
220306	Georgia Alltel Telecom, Inc.	R	UVALDA	230470	Sprint/Carolina Telephone & Telegraph C	R	NEWPORT								
220306	Georgia Alltel Telecom, Inc.	R	VILLANOW	230470	Sprint/Carolina Telephone & Telegraph C	R	NEWTON GRV								
220306	Georgia Alltel Telecom, Inc.	R	YATESVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	NORLINA								
220368	Hart Telephone Company, Inc.	R	HARTWELL	230470	Sprint/Carolina Telephone & Telegraph C	R	OCRACOCKE								
220376	Pembroke Tel. Co. Inc.	R	ELLABELLE	230470	Sprint/Carolina Telephone & Telegraph C	R	ORIENTAL								
220376	Pembroke Tel. Co. Inc.	R	PEMBROKE	230470	Sprint/Carolina Telephone & Telegraph C	R	OXFORD								
220377	Pineland Tel. Coop. Inc.	R	ADRIAN	230470	Sprint/Carolina Telephone & Telegraph C	R	PARKTON								
220377	Pineland Tel. Coop. Inc.	R	BARTOW	230470	Sprint/Carolina Telephone & Telegraph C	R	PINEHURST								
220377	Pineland Tel. Coop. Inc.	R	COBBTOWN	230470	Sprint/Carolina Telephone & Telegraph C	R	PINETOPS								
220377	Pineland Tel. Coop. Inc.	R	DAVISBORO	230470	Sprint/Carolina Telephone & Telegraph C	R	PINK HILL								
220377	Pineland Tel. Coop. Inc.	R	KITE	230470	Sprint/Carolina Telephone & Telegraph C	R	PITTSBORO								
220377	Pineland Tel. Coop. Inc.	R	LEXSY	230470	Sprint/Carolina Telephone & Telegraph C	R	PLYMOUTH								
220377	Pineland Tel. Coop. Inc.	R	METTER	230470	Sprint/Carolina Telephone & Telegraph C	R	POLLOCKSVL								
220377	Pineland Tel. Coop. Inc.	R	MIDVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	PRINCETON								
220377	Pineland Tel. Coop. Inc.	R	OAK PARK	230470	Sprint/Carolina Telephone & Telegraph C	R	RAEFORD								
220377	Pineland Tel. Coop. Inc.	R	TWIN CITY	230470	Sprint/Carolina Telephone & Telegraph C	R	REDSPRINGS								
220378	Planters Telephone Rural Telephone Co.-R	R	DOVER	230470	Sprint/Carolina Telephone & Telegraph C	R	RICHLANDS								
220378	Planters Telephone Rural Telephone Co.-R	R	GUYTON	230470	Sprint/Carolina Telephone & Telegraph C	R	RICH SQUARE								
220378	Planters Telephone Rural Telephone Co.-R	R	HILLTONIA	230470	Sprint/Carolina Telephone & Telegraph C	R	ROANOKERPD								
220378	Planters Telephone Rural Telephone Co.-R	R	NEWINGTON	230470	Sprint/Carolina Telephone & Telegraph C	R	ROBBINS								
220378	Planters Telephone Rural Telephone Co.-R	R	SO GUYTON	230470	Sprint/Carolina Telephone & Telegraph C	R	ROBERSONVL								
220394	Wilkes Tel. & Elec. Co. Inc.	R	CRAWFORDVL	230470	Sprint/Carolina Telephone & Telegraph C	R	ROCKYMOUNT								
220394	Wilkes Tel. & Elec. Co. Inc.	R	LINCOLNTON	230470	Sprint/Carolina Telephone & Telegraph C	R	ROSE HILL								
220394	Wilkes Tel. & Elec. Co. Inc.	R	METASVILLE	230470	Sprint/Carolina Telephone & Telegraph C	R	ROSEBORO								
220394	Wilkes Tel. & Elec. Co. Inc.	R	RAYLE	230470	Sprint/Carolina Telephone & Telegraph C	R	ROXBEL								
220394	Wilkes Tel. & Elec. Co. Inc.	R	TIGNALL	230470	Sprint/Carolina Telephone & Telegraph C	R	SCOTLDNECK								
220394	Wilkes Tel. & Elec. Co. Inc.	R	WASHINGTON	230470	Sprint/Carolina Telephone & Telegraph C	R	SEABOARD								
				230470	Sprint/Carolina Telephone & Telegraph C	R	SILER CITY								
				230470	Sprint/Carolina Telephone & Telegraph C	R	SMITHFIELD								
				230470	Sprint/Carolina Telephone & Telegraph C	R	SNEADSFRRY								
				230470	Sprint/Carolina Telephone & Telegraph C	R	SNOW HILL								
				230470	Sprint/Carolina Telephone & Telegraph C	R	SOUTHEPINS								
				230470	Sprint/Carolina Telephone & Telegraph C	R	SPRINGHOPE								
				230470	Sprint/Carolina Telephone & Telegraph C	R	ST PAULS								
				230470	Sprint/Carolina Telephone & Telegraph C	R	STANTONSBG								
				230470	Sprint/Carolina Telephone & Telegraph C	R	SWANQUARTR								

Exhibit D-2 - The entirety of each of the rural ILEC study areas for GA, NC VA and TN

Georgia				North Carolina				Virginia				Tennessee			
SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE
				230470	Sprint/Carolina Telephone & Telegraph C	R	SWANSBORO								
				230470	Sprint/Carolina Telephone & Telegraph C	R	TABOR CITY								
				230470	Sprint/Carolina Telephone & Telegraph C	R	TARBORO								
				230470	Sprint/Carolina Telephone & Telegraph C	R	TOPSAIL IS								
				230470	Sprint/Carolina Telephone & Telegraph C	R	TRENTON								
				230470	Sprint/Carolina Telephone & Telegraph C	R	VANCEBORO								
				230470	Sprint/Carolina Telephone & Telegraph C	R	VASS								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WAKEFOREST								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WALLACE								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WARRENTON								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WARSAW								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WASHINGTON								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WAVES								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WELDON								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WHISPEPINS								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WHITAKERS								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WHITEVILLE								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WILLIAMSTN								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WILSON								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WINDSOR								
				230470	Sprint/Carolina Telephone & Telegraph C	R	WOODLAND								
				230471	Sprint/Central Telephone Company - North	R	ASHEBORO								
				230471	Sprint/Central Telephone Company - North	R	BETHLEHEM								
				230471	Sprint/Central Telephone Company - North	R	BISCOE								
				230471	Sprint/Central Telephone Company - North	R	BOONVILLE								
				230471	Sprint/Central Telephone Company - North	R	CANDOR								
				230471	Sprint/Central Telephone Company - North	R	CATAWBA								
				230471	Sprint/Central Telephone Company - North	R	DANBURY								
				230471	Sprint/Central Telephone Company - North	R	DOBSON								
				230471	Sprint/Central Telephone Company - North	R	EDEEN								
				230471	Sprint/Central Telephone Company - North	R	ELKIN								
				230471	Sprint/Central Telephone Company - North	R	GRANITEFLS								
				230471	Sprint/Central Telephone Company - North	R	HAYS								
				230471	Sprint/Central Telephone Company - North	R	HICKORY								
				230471	Sprint/Central Telephone Company - North	R	HILDEBRAN								
				230471	Sprint/Central Telephone Company - North	R	HILLSBORGH								
				230471	Sprint/Central Telephone Company - North	R	MADISON								
				230471	Sprint/Central Telephone Company - North	R	MOCKSVILLE								
				230471	Sprint/Central Telephone Company - North	R	MOUNT AIRY								
				230471	Sprint/Central Telephone Company - North	R	MT GILEAD								
				230471	Sprint/Central Telephone Company - North	R	MT VIEW								
				230471	Sprint/Central Telephone Company - North	R	MULBERRY								
				230471	Sprint/Central Telephone Company - North	R	NOWILKESBO								
				230471	Sprint/Central Telephone Company - North	R	PILOT MT								
				230471	Sprint/Central Telephone Company - North	R	QUAKER GAP								
				230471	Sprint/Central Telephone Company - North	R	RAMSEUR								
				230471	Sprint/Central Telephone Company - North	R	ROARINGGAP								
				230471	Sprint/Central Telephone Company - North	R	ROXBORO								
				230471	Sprint/Central Telephone Company - North	R	SANDYRIDGE								
				230471	Sprint/Central Telephone Company - North	R	SEAGROVE								
				230471	Sprint/Central Telephone Company - North	R	SHERILLSFD								
				230471	Sprint/Central Telephone Company - North	R	STATE ROAD								
				230471	Sprint/Central Telephone Company - North	R	STONEVILLE								
				230471	Sprint/Central Telephone Company - North	R	TIMBERLAKE								
				230471	Sprint/Central Telephone Company - North	R	TROY								
				230471	Sprint/Central Telephone Company - North	R	VALDESE								
				230471	Sprint/Central Telephone Company - North	R	VIRGINIA								
				230471	Sprint/Central Telephone Company - North	R	WALKERTOWN								
				230471	Sprint/Central Telephone Company - North	R	WALNUTCOVE								
				230471	Sprint/Central Telephone Company - North	R	WEST END								
				230471	Sprint/Central Telephone Company - North	R	WJEFFERSON								
				230471	Sprint/Central Telephone Company - North	R	YADKINVL								
				230502	Star Tel. Membership Corp.	R	ABBOTTSBG								
				230502	Star Tel. Membership Corp.	R	COHARIE								
				230502	Star Tel. Membership Corp.	R	CYPRESSCRK								
				230502	Star Tel. Membership Corp.	R	HARRELLS								
				230502	Star Tel. Membership Corp.	R	HERRING								
				230502	Star Tel. Membership Corp.	R	KELLY								
				230502	Star Tel. Membership Corp.	R	LISBON								
				230502	Star Tel. Membership Corp.	R	SIX RUN								
				230502	Star Tel. Membership Corp.	R	SOUTHRIVER								
				230502	Star Tel. Membership Corp.	R	WHITE OAK								
				230503	Surry Tel. Membership Corp.	R	BEULAH								
				230503	Surry Tel. Membership Corp.	R	LEVELCROSS								
				230503	Surry Tel. Membership Corp.	R	RED BRUSH								
				230503	Surry Tel. Membership Corp.	R	SHOALS								
				230503	Surry Tel. Membership Corp.	R	WESTFIELD								
				230503	Surry Tel. Membership Corp.	R	ZEPHYR								
				230474	The Concord Telephone Company, Inc.	R	AUBEMARLE								
				230474	The Concord Telephone Company, Inc.	R	BADIN								
				230474	The Concord Telephone Company, Inc.	R	CHNGRVLNDS								
				230474	The Concord Telephone Company, Inc.	R	CONCORD								
				230474	The Concord Telephone Company, Inc.	R	HARRISBURG								
				230474	The Concord Telephone Company, Inc.	R	KANNAPOLIS								
				230474	The Concord Telephone Company, Inc.	R	MTPLEASANT								
				230474	The Concord Telephone Company, Inc.	R	NEW LONDON								
				230474	The Concord Telephone Company, Inc.	R	OAKBORO								

Exhibit D-2 - The entirety of each of the rural ILEC study areas for GA, NC VA and TN

Georgia				North Carolina				Virginia				Tennessee			
SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE	SAC	Study_Area_Name	Rural	RC_ABBRE
				230505	Tri-County Tel. Membership Corp.	R	PIKE ROAD								
				230505	Tri-County Tel. Membership Corp.	R	PINETOWN								
				230505	Tri-County Tel. Membership Corp.	R	SIDNEY								
				230510	Wilkes Telephone Membership Corporatio	R	BOOMER								
				230510	Wilkes Telephone Membership Corporatio	R	CHAMPION								
				230510	Wilkes Telephone Membership Corporatio	R	CLINGMAN								
				230510	Wilkes Telephone Membership Corporatio	R	LOMAX								
				230511	Yadkin Valley Tel. Membership Corp.	R	ADVANCE								
				230511	Yadkin Valley Tel. Membership Corp.	R	BROOKS								
				230511	Yadkin Valley Tel. Membership Corp.	R	COOLEEMEE								
				230511	Yadkin Valley Tel. Membership Corp.	R	COURTNEY								
				230511	Yadkin Valley Tel. Membership Corp.	R	EAST BEND								
				230511	Yadkin Valley Tel. Membership Corp.	R	FORBUSH								
				230511	Yadkin Valley Tel. Membership Corp.	R	HARMONY								
				230511	Yadkin Valley Tel. Membership Corp.	R	UJAMES								
				230511	Yadkin Valley Tel. Membership Corp.	R	NEW HOPE								
				230511	Yadkin Valley Tel. Membership Corp.	R	UNIONGROVE								

## **REDACTED VERSION FOR PUBLIC INSPECTION**

### **Exhibit E**

#### **SunCom's Five Year Plan for Network Improvements Due to the Receipt of High-Cost Support**

The attached spreadsheet **[NOT INCLUDED WITH REDACTED VERSION]** demonstrates that SunCom will use the universal service support funds that it receives for maintaining and improving service in a manner that would not occur absent receipt of such support. The first page of the spreadsheet lists **[REDACTED]** cell sites in rural portions of **[REDACTED]** BTAs in which usage is low, due to the low population densities of the relatively rural areas that these cell sites serve, and accordingly the cost of operating these cell sites exceeds the revenues attributable to them by a total of over **[REDACTED]** per year. In the absence of universal service support, SunCom would have to decommission these highly unprofitable cell sites. However, if SunCom receives ETC designation and universal service support, it will continue operating these **[REDACTED]** cell sites.

The second page of the spreadsheet provides a list of **[REDACTED]** cell sites that SunCom would like to construct in rural portions of **[REDACTED]** BTAs – at a total cost of **[REDACTED]** – over the next five years. It would not be profitable to construct these cell sites if universal service funding is unavailable, but if SunCom receives ETC designation it plans to construct these sites.

The third page of the spreadsheet lists the operating costs associated with the **[REDACTED]** cell sites referred to in the preceding paragraph. SunCom expects to incur over **[REDACTED]** per year in operating costs on these cell sites. Again, these cell sites will be constructed only if SunCom receives ETC designation and obtains access to high-cost universal service support.

The parameters of these build-out plans may change over time in response to changes in customer demand and other marketplace conditions. At the present time, however, these plans constitute a good-faith estimate of the universal service benefits – due to expanded coverage and improved signal strength and service quality – that rural consumers in Georgia, North Carolina, Virginia, and Tennessee will enjoy as a result of the Commission's designating SunCom as an ETC.



## **EXHIBIT F**

### **DECLARATION OF CHARLES KALLENBACH**

## **Exhibit F**

### **Declaration of Charles Kallenbach**

Pursuant to 47 C.F.R. § 1.16, Charles Kallenbach declares under penalty of perjury the following:

1. My name is Charles Kallenbach and I serve as Senior Vice President for Legal and Regulatory Affairs for SunCom Wireless, Inc. ("SunCom"). My business address is 1100 Cassatt Road, Berwyn, PA 19312. I am an authorized representative of SunCom with regard to SunCom's Petition for Designation as an Eligible Telecommunications Carrier in Georgia, North Carolina, Tennessee, and Virginia.

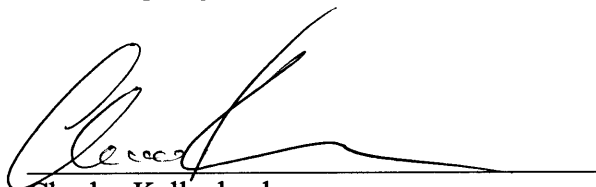
2. I have read the foregoing Petition and all information therein is true and correct to the best of my knowledge, information and belief.

3. High-Cost Certification. SunCom certifies that all high-cost universal service support received in Georgia, North Carolina, Tennessee, and Virginia – including High-Cost Model Support, Interstate Access Support, High Cost Loop Support, Local Switching Support, and Interstate Common Line Support – will be used only for the provision, maintenance, and upgrading of services and facilities for which the support is intended.

4. Anti-Drug Abuse Certification. To the best of my knowledge, the applicant referred to in the foregoing Petition, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) of the applicant as specified by Section 1.2002(b) of the Commission's rules, are not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on June 23, 2005.

A handwritten signature in black ink, appearing to read 'Charles Kallenbach', is written over a horizontal line.

Charles Kallenbach  
Senior Vice President for Legal and  
Regulatory Affairs  
SunCom Wireless, Inc.